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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 08/31/98

Dr. IRENE KASSORLA, dba IRENE KASSORLA, Psychologist, Inc. '96, [REDACTED], telephone [REDACTED], was interviewed pursuant to the provisions of a form entitled, "Authorization to Release Psychological Treatment Records and Information," that was executed by MONICA S. LEWINSKY. Present for the interview was Associate Independent Counsel (AIC) MICHAEL EMMICK of the Office of the Independent Counsel (OIC).

KASSORLA, a white female, born [REDACTED], was interviewed in the office of her attorney, ALAN I. KAPLAN, 1925 Century Park East, Suite 600, Los Angeles, California 90067, telephone [REDACTED]. Also representing KASSORLA was JOHN H. LAVELY, JR., 2049 Century Park East, Los Angeles, California 90067, telephone [REDACTED], and CAROL ANN PETREN, 1341 G Street N.W., Washington, D.C. 20005, telephone [REDACTED]. KASSORLA requested that the details of her interview not be made public; however, she was cautioned that the OIC could not guarantee this and that she should assume that it would be made public. Thereafter, KASSORLA provided the following information:

KASSORLA said that she would be answering questions based solely on her memory, as she did not take any notes or prepare any records of the content of her discussions with LEWINSKY.

KASSORLA counseled MONICA LEWINSKY from 1992 to June 18, 1997. KASSORLA knows LEWINSKY as MONICA LEWIS and her records are maintained under that name. Since January 1998, KASSORLA has maintained LEWINSKY's file under the name [REDACTED] in order to afford greater privacy. KASSORLA became very concerned for LEWINSKY when the scandal broke in January.

KASSORLA counseled LEWINSKY in person until the fall of 1993 when LEWINSKY moved to Portland, Oregon to attend LEWIS and CLARK COLLEGE. Thereafter, some telephone consultations were scheduled and others occurred when LEWINSKY called KASSORLA. The consultations did not occur on a regular basis, partially because of money concerns on LEWINSKY's part. KASSORLA declined to provide the name of the person paying LEWINSKY's fees.

Investigation on 08/28/98 LOS ANGELES, CALIFORNIA File # 29D OIC LR 35063

by CI [REDACTED] Date dictated 08/31/98

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After LEWINSKY moved to Washington, D.C., in the summer of 1995, KASSORLA recommended that LEWINSKY join some groups there in order to increase her social contacts. KASSORLA received a call from LEWINSKY just after her affair with President WILLIAM J. CLINTON began. LEWINSKY was happy, giddy, and excited when she related the beginning of her relationship with the President. LEWINSKY was very happy to be desired. KASSORLA was shocked and surprised at the relationship, but believed LEWINSKY to be truthful from the start. KASSORLA believed that the relationship had just started since that is what LEWINSKY told her and because LEWINSKY was always very forthright and would not hold anything back.

LEWINSKY said she met with the President in a room or area next to the Oval Office that had two doors.

Over time, KASSORLA learned more about how the affair was developing. LEWINSKY said she had performed oral sex on the President, that they had engaged in the usual foreplay and fondling of each other, but that they had not engaged in sexual intercourse. KASSORLA said that some of the sexual encounters occurred while LEWINSKY and the President were standing up. KASSORLA expressed concern that the President and LEWINSKY would be discovered and recommended that the two doors be locked.

LEWINSKY related to KASSORLA that she and the President were lovers, but that they did not have intercourse. The President did not want to have intercourse, but his rationale is unknown to KASSORLA. LEWINSKY had orgasms by manipulation and it was KASSORLA's impression that the President touched LEWINSKY to cause the orgasms. At times, this affair was an overwhelmingly satisfying relationship for LEWINSKY. The affair provided help for LEWINSKY's problems of self esteem and self confidence.

The central theme of LEWINSKY's relationship with the President was that the President dominated the encounters. KASSORLA has a fuzzy memory of LEWINSKY saying that the President was very cautious to conceal their relationship. KASSORLA advised LEWINSKY on multiple occasions that she was an employee having an office romance with a superior, that she would ultimately lose her job, and would have bad references for future jobs. KASSORLA tried to prepare LEWINSKY for the desperate ego blow that would result when she would be fired to protect the President. KASSORLA counseled LEWINSKY not to share this information with anyone except another therapist, inasmuch as LEWINSKY was the only one who would be harmed. KASSORLA recommended that LEWINSKY obtain a therapist in Washington, D.C.,

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who could see LEWINSKY in person to provide closer support. KASSORLA is unaware whether LEWINSKY advised others of her relationship with the President.

At some point during the telephonic consultations, KASSORLA recommended that they use a code name for the President in case they were overheard. KASSORLA's recollection is that KASSORLA suggested the name "ELIZABETH" or a similar name. They also referred to the President as "her."

LEWINSKY probably did not see the down side of her relationship. However, it was very frustrating for LEWINSKY since the President was in charge of scheduling their sexual encounters. The President became LEWINSKY's life. [REDACTED]

[REDACTED] It was an injection of joy into LEWINSKY's life when the President scheduled a visit with her. Sometimes LEWINSKY and KASSORLA discussed what LEWINSKY was going to wear on her next scheduled visit with the President. KASSORLA was very concerned about LEWINSKY's periodic bouts of depression and sadness, which coincided with the absence of contact with the President. LEWINSKY was very negative at times. KASSORLA said that there is always some possibility of suicide with depressed people.

KASSORLA considered LEWINSKY to be very open, very honest, and very giving. KASSORLA had no reason to suspect that LEWINSKY was withholding any information from her. KASSORLA believes that the information concerning sexual events between LEWINSKY and the President were reported to KASSORLA soon after they occurred. KASSORLA returned several of LEWINSKY's calls to her office at the White House.

It was the impression of KASSORLA that after LEWINSKY began working in the Pentagon, LEWINSKY could only get into the White House if the President called and invited her over. KASSORLA knows BETTY CURRIE by name only. KASSORLA never heard the name of LINDA TRIPP from LEWINSKY. KASSORLA never heard any discussion of the PAULA JONES lawsuit or the fact that LEWINSKY had been subpoenaed in that case.

LEWINSKY bought the President a tie, which he wore to an event in the Rose Garden. The President gave knowing glances to LEWINSKY at the event. KASSORLA has the impression that LEWINSKY gave other gifts to the President, but has no further recollection. KASSORLA has no knowledge of any notes or letters that LEWINSKY sent to the President. KASSORLA has a vague

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recollection that the President may have given LEWINSKY a book of poetry. KASSORLA has no recollection of any other gifts the President may have given LEWINSKY.

LEWINSKY spoke of numerous telephone calls that she received from the President. LEWINSKY played a recording of a message from the President to LEWINSKY in which he uttered the words "aw shucks." KASSORLA recognized the President's voice. LEWINSKY may have mentioned the "phone sex" calls, but KASSORLA has no recollection.

After LEWINSKY was transferred to the Pentagon from the White House, she expressed her continued unhappiness with the new job. KASSORLA tried to sell LEWINSKY on the positive aspects of the Pentagon job, but KASSORLA was unsuccessful. LEWINSKY spoke many times of wanting to go back to work in the White House. KASSORLA has no knowledge of EVELYN LIEBERMAN or MARSHA SCOTT.

The President gave LEWINSKY a goodbye speech in which he said that LEWINSKY was such a wonderful girl, but that he was concerned about his wife and daughter. KASSORLA believes that the speech was manufactured by the President and not sincere. LEWINSKY accepted the speech as true.

KASSORLA said that LEWINSKY's credibility is without question. LEWINSKY has never been dysfunctional or delusional, as evidenced by the fact that she was able to work at several jobs and attend school. LEWINSKY's thought processes were good. LEWINSKY has been completely consistent in repeating the details of her relationship with the President. KASSORLA had almost a five year association with LEWINSKY and found her to be consistently truthful.

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OFFICE OF THE INDEPENDENT COUNSEL

4/1/98

Date of transcription

WALTER KAYE, Civilian Aide to the Secretary of the Army (CASA), and retired insurance executive, was interviewed at the REGENCY HOTEL in New York City, by appointment through his attorney, RICHARD E. HOLIMAN, 400 West Capitol Street, Little Rock, AR, telephone [REDACTED]. HOLIMAN and KAYE were advised of the purpose of the interview, as well as the personal and official identities of Federal Bureau of Investigation (FBI) Special Agents (SAs) [REDACTED] and Office of the Independent Counsel (OIC) Investigator [REDACTED]. KAYE then provided the following information:

KAYE formerly owned a company known as KAYE INSURANCE, L.P., and he is now a consultant to that company, as well as being Chairman Emeritus. Additionally, KAYE is one of two CASA's for the state of New York, having been appointed to this unpaid position by Secretary of the Army, TOGO WEST, in 1993. KAYE was not acquainted with WEST prior to the appointment. KAYE stated that he takes several trips each year on behalf of the U.S. Army for the purpose of extending and enhancing the image of the U.S. Army. KAYE pointed out that the trips are not just within the state of New York, and that he always pays his own expenses.

KAYE advised that he first became associated with the Democratic Party in 1973, and since that time has served in several volunteer positions in addition to donating several thousand dollars to various Democratic causes. This political activity has also resulted in KAYE meeting and working with many Democratic activists and supporters.

KAYE met MARCIA LEWIS approximately 10 to 15 years ago in Beverly Hills, California, as a result of being introduced to her by a mutual friend, JOSEPH SINAY. KAYE had infrequent contact with LEWIS over the next several years, and remembers that, in about 1994 or 1995 she moved to Washington, D.C., where he saw her occasionally. KAYE recalls it was sometime after LEWIS moved to Washington, D.C. that LEWIS contacted him and asked him to assist in getting an intern job at the White House for her daughter, MONICA LEWINSKY. KAYE does not recall the specifics of meeting LEWINSKY, but is reasonably certain that he

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SA [REDACTED];
by CI [REDACTED] Date dictated 4/1/98

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did meet with her at some point in the process and, that this occasion was his first time to ever meet LEWINSKY. KAYE stated that over the years he has helped other people get jobs, and he always tries to interview all of these people, even though sometimes he might only do a telephone interview. KAYE said his normal practice is to ask for a resume, and he probably did in this case as well; however, he cannot now remember seeing a resume for LEWINSKY.

KAYE remembers that after receiving the request from LEWIS and LEWINSKY, he then called "the people" at the Democratic National Party to see if they could help in the placement of LEWINSKY. KAYE does not currently remember for certain who he may have discussed the LEWINSKY job with, but believes it may have been JENNIFER SCULLY, who at that time was a full-time worker at the Democratic Party Headquarters. KAYE does not recall writing a letter to anyone, calling anyone at the White House, and does not recall visiting anyone at the White House on behalf of LEWINSKY. KAYE did state that it was possible that he discussed the possibility of a job for LEWINSKY with ANN MCCOY, who worked in the visitors office at the White House at that time.

KAYE has no recollection of speaking to President CLINTON, First Lady HILLARY CLINTON, NANCY HERNREICH, BETTY CURRIE, MAGGIE WILLIAMS, BOB NASH, VERNON JORDAN, or JOHN PODESTA about getting a White House job for LEWINSKY.

KAYE believes that his inquiries and contacts were "instrumental" in getting LEWINSKY an intern position at the White House. KAYE believes that he actually learned of the appointment of LEWINSKY from LEWINSKY or her mother, and did not otherwise have advance notice that she was going to be accepted into the intern program. KAYE remembers that each of them and possibly LEWINSKY's aunt, DEBRA FINERMAN, thanked him for getting LEWINSKY the appointment. KAYE remembers that FINERMAN had, at some point, also asked for his assistance, and they had also discussed the possibility of getting LEWINSKY into the intern program. FINERMAN was a close friend of KAYE's and he saw her more frequently than LEWINSKY or LEWIS.

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KAYE recalled that, after LEWINSKY had been working at the White House for awhile, he was again contacted by LEWIS or LEWINSKY, or both, concerning the possibility of getting LEWINSKY a paying job at the White House. KAYE believes that he was asked about the paying job by LEWIS. LEWIS gave as a reason for the request, that LEWINSKY's father had refused to financially support LEWINSKY any longer. KAYE told LEWIS, "I'll try." KAYE said that, by this time, he had become incensed by the book written by LEWIS entitled The Three Tenors, therefore, even at the time when she asked for assistance, he had no intention of helping LEWINSKY get a new position.

KAYE stated that even though he could not be certain about the dates, he did recall that, again, either LEWIS, LEWINSKY, or both contacted him and asked for assistance with regard to getting LEWINSKY a job at the Pentagon. KAYE remembers these two events being in close proximity in time and that he chose not to make any calls on LEWINSKY's behalf, primarily because of his remaining anger over LEWIS's book. KAYE said he never confronted LEWIS regarding his strong feelings about the book.

KAYE stated that he heard a rumor later which indicated that the job held by LEWINSKY had been eliminated and this required that she seek other employment.

KAYE remembers that probably both FINERMAN and LEWINSKY talked to him about getting LEWINSKY in to a fundraiser in New York City. He remembers that he told both of them that he could not help with their request and also remembers saying "these things cost a lot of money." KAYE clearly recalls that he did not buy LEWINSKY a ticket to the fundraiser.

Another request that KAYE recalls being made by LEWINSKY, at some point in time, was if KAYE could get LEWINSKY in to see the President. LEWINSKY seemed to be taken in by the glamor of the situation. KAYE indicated to her that he could not arrange such a meeting. KAYE said that even though he does not recall ever expressing to anyone his evaluation of LEWINSKY, it was his feeling that she was an "aggressive young lady."

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Sometime during LEWINSKY's employment at the Pentagon, KAYE remembers hearing rumors to the effect that LEWINSKY and the President may be having an affair. KAYE claimed not to remember from whom he heard these rumors, but guessed that it possibly could be from FINERMAN. KAYE stated that he slowly began to distance himself from LEWINSKY, LEWIS, and FINERMAN following the publication of LEWIS's book.

The above interview was concluded; however, approximately two hours later on the initiative of KAYE's attorney (HOLIMAN), KAYE telephonically provided the following additional information concerning the interview:

KAYE recalls that he received a telephone call from BRUCE LINDSEY either the next day, or possibly up to two days, after the CLINTON/LEWINSKY story was made public in the newspapers. KAYE said that LINDSEY had called him first, and then the following conversation took place when KAYE returned his call. LINDSEY asked KAYE what he knew about MONICA LEWINSKY. KAYE said he was beginning to tell him what he knew about LEWINSKY when LINDSEY cut in and said that he had to take another very important telephone call and that he would call him back later. KAYE said LINDSEY did not call back and he has not talked to LINDSEY since that time.

KAYE said the next topic covered in the interview that may need some additional clarification had to do with who had passed to him the rumor that the President was having an affair with LEWINSKY. KAYE said that, after thinking about this he now believes that it was either CAROL PINSKY or RONNIE GINOTT. Both were at that time affiliated with the Democratic Party. PINSKY was more directly a part of the Women's Leadership Forum (WLF), which is a part of the Democratic Party structure. KAYE said it was one or the other of these two people, and possibly both of them. KAYE stated that he did not believe the rumors and did not take any action as a result of hearing them.

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KAYE is described as follows from observation and interview:

Name:	WALTER KAYE
Race:	Caucasian
Sex:	Male
Date of Birth:	[REDACTED]
Social Security	[REDACTED]
Account Number:	[REDACTED]
Residence:	[REDACTED]
Telephone Number:	[REDACTED]
Employment:	Office of Secretary of the Army Civilian Aide, Secretary of the Army 122 East 42nd Street New York City, NY 10168
Telephone:	212-338-2300

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001

Thursday, May 21, 1998

The testimony of WALTER KAYE was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:49 a.m., before:

SOLOMON WISENBERG
MARY ANN WIRTH
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

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PROCEEDINGS

1
2 Whereupon,
3 WALTER KAYE
4 was called as a witness and, having been first duly sworn by
5 the Foreperson of the Grand Jury, was examined and testified
6 as follows:

EXAMINATION

BY MR. WISENBERG:

9 Q Good morning. Would you state your name for the
10 record, please?

11 A Yes. Walter Kaye, K-a-y-e.

12 Q And, Mr. Kaye, my name is Sol Wisenberg. I think
13 we met outside. I'm with the Office of the Independent
14 Counsel. To my left is my colleague, Mary Ann Wirth, who's
15 also an attorney with the Office of Independent Counsel.

16 This is the grand jury court reporter, and these
17 are the grand jurors.

18 I'm going to go through your rights and
19 responsibilities as a grand jury witness, and a little bit
20 about our authority, and then I'm going to -- as I do that,
21 occasionally I'll ask you a question, and what I would ask
22 for is an audible response that the court reporter can pick
23 up.

24 A I just have to mention to you, although you're
25 talking in a loud enough voice, but for anybody else who asks

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1 me a question, I have no hearing on my left ear.

2 Q Okay.

3 A So sometimes it's pretty difficult for me to
4 understand, so --

5 Q Okay. Well, if there's anything you don't
6 understand, if we're not loud enough, let us know.

7 A You're fine.

8 Q Okay. Yes, I'm not usually accused of being too
9 soft-spoken.

10 This is a federal grand jury impaneled by the
11 United States District Court for the District of Columbia.
12 Do you understand that?

13 A Yes, sir.

14 Q And we are empowered -- the grand jury is empowered
15 to look at, among other things, possible obstruction of
16 justice in relation to the lawsuit of Jones v. Clinton. Do
17 you understand that?

18 A Say that again?

19 Q One of the things the grand jury has been charged
20 with doing is looking into possible obstruction of justice in
21 the lawsuit of Jones v. Clinton.

22 A Right.

23 Q Do you understand, sir?

24 A Which I read about in the papers.

25 Q Right. And I'm now going to go into your rights

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1 and responsibilities as a grand jury witness.
 2 First of all, you have the privilege against self-
 3 incrimination. Do you understand that?
 4 A I wouldn't mind if you'd explain that to me.
 5 Q Okay. In other words, if a truthful answer to any
 6 of our questions today would tend to incriminate you --
 7 A A truthful answer?
 8 Q A truthful answer, right. You're never allowed to
 9 give an untruthful answer.
 10 A Right.
 11 Q But if a truthful answer to a question would tend
 12 to incriminate you, you can say, "I refuse to answer on the
 13 grounds of self-incrimination." Do you understand that?
 14 A Is that similar to the Fifth Amendment?
 15 Q It is, it's exactly the same.
 16 A I've never had any experience with it, but, again,
 17 just as a layperson who's read about these things.
 18 Q Right. In other words, I'll give you an example.
 19 If I ask you, did you rob the Gotham City Bank on April 1,
 20 1995? If, in fact, you really did rob that bank, then the
 21 truthful answer to that would be yes, but that would
 22 incriminate you. So you could say, "Mr. Wisenberg, I assert
 23 my Fifth Amendment rights. I refuse to answer on the grounds
 24 that it may incriminate me." Do you understand?
 25 A Yes, sir.

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1 Q I'll give you another example. Let's say that the
 2 Gotham City Bank was robbed by a person driving a red Camaro,
 3 and that you robbed the bank, and that you had a red Camaro,
 4 you drove a red Camaro to the bank.
 5 If I asked you, Mr. Kaye, did you drive a red
 6 Camaro on April 1, 1995, you could refuse to answer on Fifth
 7 Amendment grounds because that would tend to incriminate you.
 8 Do you understand that?
 9 A Yes, sir.
 10 Q Okay. You do not have a right to have a lawyer
 11 with you in the grand jury room. Do you understand that?
 12 A Yes, I understand that.
 13 Q But you do have a right to have a lawyer outside of
 14 the grand jury room. Do you understand that?
 15 A Yes, sir.
 16 Q And do you have such a lawyer?
 17 A Yes, I do.
 18 Q And can you tell us what his name is?
 19 A Rick Holiman. It's Rick or Richard. His last name
 20 is Holiman.
 21 Q All right.
 22 A H-o-l-i-m-a-n.
 23 Q All right. And he's got an associate, or you have
 24 any lawyer out there, too?
 25 A Well, yeah. The other lawyer's been my lawyer for

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1 30, 40 years. I just thought he ought to come down, too.
 2 Q Okay. And his name is?
 3 A Norman Cohen, C-o-h-e-n.
 4 Can I ask you a question? I'm a very curious guy.
 5 Is that a dictation machine or -- am I allowed to ask that?
 6 THE REPORTER: Yes, it is.
 7 THE WITNESS: So it's -- you're dictating -- oh, I
 8 sec. So you're dictating into the machine -- I understand.
 9 I'm sorry, but I --
 10 BY MR. WISENBERG:
 11 Q Generally the witness doesn't ask questions.
 12 A Oh, okay.
 13 (Laughter.)
 14 Q But that's a perfectly acceptable question.
 15 Now, even though your lawyer can't be here with
 16 you, you will be given a reasonable opportunity, if you need
 17 to, to go talk to your lawyer. You understand that?
 18 A Yes, sir.
 19 Q All right. We are bound by an oath of secrecy.
 20 That is, myself, Ms. Wirth, the court reporter, and the grand
 21 jurors are not allowed to talk about -- with certain
 22 exceptions are not allowed to talk about what goes on here
 23 today. Do you understand that?
 24 A Yes, sir.
 25 Q On the other hand, you are not bound by an oath of

Page

1 secrecy. You can tell anybody you want to or not tell
 2 anybody you want to. That's between you and your attorney.
 3 Do you understand?
 4 A Yes, sir.
 5 Q All right. I'll give you an example of one or two
 6 exceptions to our secrecy requirements. For instance, if
 7 there was ever a trial as a result of this investigation, and
 8 you were to be witness, and you said something different at
 9 trial than you said here at the grand jury, then somebody
 10 could use your grand jury testimony and say, "Mr. Kaye, you
 11 said something different at the grand jury."
 12 That would be an example of where the secrecy rule
 13 can be breached. Do you understand that?
 14 A Yes, sir.
 15 Q And it can be breached whenever a court gives us
 16 permission. If you go to a court and say, "Here's a reason
 17 why we need to breach grand jury secrecy here," and the court
 18 allows you to do it, you could do it. You understand that?
 19 A Yes, sir.
 20 Q All right. You understand that you have an
 21 obligation to tell the truth.
 22 A Yes, sir.
 23 Q Everybody who testifies -- and these rights we read
 24 to everybody who comes in front of the grand jury, most
 25 everybody. Everybody who testifies in front of the grand

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<p>1 jury is under oath and subject to the rules about perjury.</p> <p>2 Do you understand that?</p> <p>3 A Yes, sir.</p> <p>4 Q Like I said, if there are any questions that you</p> <p>5 don't understand, either because you can't hear them or</p> <p>6 because they're too convoluted, too lawyer-like, or just</p> <p>7 plain incomprehensible, just let us know and we'll rephrase</p> <p>8 the question.</p> <p>9 A Okay, fine.</p> <p>10 Q Is there anything about your rights and</p> <p>11 responsibilities as a grand jury witness that you do not</p> <p>12 understand?</p> <p>13 A I think I understand them pretty well.</p> <p>14 Q One other thing. There are different categories of</p> <p>15 witnesses who come in front of a grand jury. And there are</p> <p>16 people who are targets. And I'm speaking -- this is an</p> <p>17 unofficial designation of witnesses.</p> <p>18 You have targets, subjects, and witnesses in front</p> <p>19 of a grand jury. A target is a person who the prosecutor and</p> <p>20 the grand jury are more than 50 percent certain that person</p> <p>21 is going to be indicted. Do you understand?</p> <p>22 A (Nodding.)</p> <p>23 Q You have to answer yes or no.</p> <p>24 A I understand, yes.</p> <p>25 Q You are not a target. You understand that?</p>	<p>1 that correct?</p> <p>2 A Those are the ones that pertain to this.</p> <p>3 Q Okay.</p> <p>4 Q And as a result of that subpoena you've brought us</p> <p>5 some documents; is that correct?</p> <p>6 A Yes, sir.</p> <p>7 Q Before we get started on the questioning, let me --</p> <p>8 I'm going to come over next to you and I'll come on this side</p> <p>9 since --</p> <p>10 A That's the good ear.</p> <p>11 Q -- this is the good ear. We'll go over them.</p> <p>12 A Sure.</p> <p>13 Q What is your -- do you have a middle initial?</p> <p>14 A No, I do not.</p> <p>15 Q Okay. I'm going to mark the first packet as Grand</p> <p>16 Jury Exhibit WK-1.</p> <p>17 (Grand Jury Exhibit No. WK-1 was</p> <p>18 marked for identification.)</p> <p>19 BY MR. WISENBERG:</p> <p>20 Q And you see where I have put WK-1 on there; is that</p> <p>21 correct?</p> <p>22 A Yes, sir.</p> <p>23 Q Can you tell us generally what this packet is?</p> <p>24 A This is Norman Cohen's -- and I can't even read it,</p> <p>25 his memorandum. This letter is a letter that Cohen -- you</p>
Page 10	Page 12
<p>1 A Thank you.</p> <p>2 Q Okay. A subject would be somebody who's not a</p> <p>3 target, but who the grand jury has some concerns about their</p> <p>4 activity. Do you understand that definition?</p> <p>5 A Yes.</p> <p>6 Q You are not a subject. You understand that.</p> <p>7 A Yes, sir.</p> <p>8 Q A witness is somebody who just comes before the</p> <p>9 grand jury and has information that the grand jury believes</p> <p>10 is relevant. Do you understand that definition?</p> <p>11 A Yes, sir.</p> <p>12 Q You are a witness. You understand that.</p> <p>13 A Yes, sir.</p> <p>14 Q We can't promise anybody that they'll always remain</p> <p>15 in that category, the witness category. We can't tell</p> <p>16 anyone, "You'll never be a target." But that's the category,</p> <p>17 informal category, that you're in now. Do you understand</p> <p>18 that?</p> <p>19 A Yes, sir.</p> <p>20 Q Okay. With that, I will hand it over to my</p> <p>21 colleague -- oh, yes, one other thing. I understand you're</p> <p>22 here pursuant to subpoena today; is that correct?</p> <p>23 A Right.</p> <p>24 Q And in addition to calling for you to come, there</p> <p>25 was a subpoena for any relevant documents that you have; is</p>	<p>1 know, it comes from Norman Cohen, in which he writes to me</p> <p>2 about an investment that I made in this magazine that you'll</p> <p>3 come across here.</p> <p>4 Q And that's Beverly Hills Magazine?</p> <p>5 A That was the Beverly Hills Magazine.</p> <p>6 Q And who was it that asked you to invest in that</p> <p>7 magazine?</p> <p>8 A Marcia Lewis and her sister, Debra Finerman.</p> <p>9 Q Okay. And I believe she's referred to in this</p> <p>10 letter from your attorney to you as Debra Lewis; is that</p> <p>11 correct?</p> <p>12 A Yeah, yeah, but her name is -- well, that was her</p> <p>13 maiden -- I don't even know why that was, but she sometimes</p> <p>14 would call herself Debra Lewis and sometimes Debra Finerman.</p> <p>15 Q But it's one and the same person.</p> <p>16 A It's the same person, yes.</p> <p>17 Q Okay. And this exhibit, WK-1, has 1, 2, 3, 4, 5,</p> <p>18 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 pages; is that correct?</p> <p>19 A Yes, sir.</p> <p>20 Q And it includes different kinds of documents,</p> <p>21 letters discussing the corporation papers; is that correct?</p> <p>22 A Yes, sir.</p> <p>23 Q Okay. We won't go through them all.</p> <p>24 A Okay.</p> <p>25 Q The second document is a copy of something that</p>

Page 13	Page 15
<p>1 says, "1994 Income from Pass-Thrus"; is that correct?</p> <p>2 A Yes, sir.</p> <p>3 Q Can you tell us briefly what that is?</p> <p>4 A I really don't know. I don't know what a pass-</p> <p>5 through is. My tax returns are always done by my accountant,</p> <p>6 so --</p> <p>7 Q Okay. And there's a little yellow sticky that</p> <p>8 says, "From 1994 Tax Return"; is that correct?</p> <p>9 A Evidently my secretary or my assistant took that</p> <p>10 from the tax return.</p> <p>11 Q Okay. So I'm going to mark this as WK-2.</p> <p>12 A Okay, sir.</p> <p>13 (Grand Jury Exhibit No. WK-2 was</p> <p>14 marked for identification.)</p> <p>15 BY MR. WISENBERG:</p> <p>16 Q And just to show you how thorough we are, how</p> <p>17 technical, how something-or-other, I'm going to mark the</p> <p>18 little sticky, since it's not stapled on, as WK-3.</p> <p>19 A Okay, sir.</p> <p>20 (Grand Jury Exhibit No. WK-3 was</p> <p>21 marked for identification.)</p> <p>22 BY MR. WISENBERG:</p> <p>23 Q And I have done so; is that correct?</p> <p>24 A Yes, sir.</p> <p>25 Q Our next document is a copy, front and back, of a</p>	<p>1 A Yes, sir.</p> <p>2 Q All right. I'm trying to mark it in a place where</p> <p>3 it won't cover up anything.</p> <p>4 (Grand Jury Exhibit No. WK-5 was</p> <p>5 marked for identification.)</p> <p>6 BY MR. WISENBERG:</p> <p>7 Q I've marked that WK-5; is that correct?</p> <p>8 A Yes, sir.</p> <p>9 Q All right. And then after that is a California</p> <p>10 form, a corporation election or termination revocation,</p> <p>11 California Form 3560; is that correct?</p> <p>12 A That's what it says, yes. This was the termination</p> <p>13 of the partnership or --</p> <p>14 Q Well, it says, "S Corporation Election or</p> <p>15 Termination/Revocation." But it appears to be a tax document</p> <p>16 related to you and the Beverly Hills Magazine.</p> <p>17 A Which I really don't understand.</p> <p>18 Q I don't either.</p> <p>19 A Okay.</p> <p>20 Q But we're going to mark it because you brought it.</p> <p>21 We'll have somebody look at it who does understand it.</p> <p>22 (Grand Jury Exhibit No. WK-6 was</p> <p>23 marked for identification.)</p> <p>24 BY MR. WISENBERG:</p> <p>25 Q And I've marked that as WK-6; is that correct?</p>
Page 14	Page
<p>1 check from you to the Beverly Hills Magazine; is that</p> <p>2 correct?</p> <p>3 A Yes, sir. Yes, sir.</p> <p>4 Q All right. And that represents that \$30,000</p> <p>5 investment that you spoke about, all right?</p> <p>6 A Right.</p> <p>7 Q We're going to mark that as WK-4.</p> <p>8 (Grand Jury Exhibit No. WK-4 was</p> <p>9 marked for identification.)</p> <p>10 BY MR. WISENBERG:</p> <p>11 Q And have I marked that as WK-4?</p> <p>12 A (No response.)</p> <p>13 Q Is that correct?</p> <p>14 A Yes, sir.</p> <p>15 Q All right. Then we have some tax -- what look like</p> <p>16 pages from a tax return; is that correct?</p> <p>17 A I believe so, yes, sir. I'm pretty sure.</p> <p>18 Q Or if not from a tax return, at least tax-related</p> <p>19 document; is that correct?</p> <p>20 A Yes, sir.</p> <p>21 Q It says Schedule -- oh, it's a K-1; is that</p> <p>22 correct?</p> <p>23 A That's the information they would give me.</p> <p>24 Q All right. And that's from Beverly Hills Magazine</p> <p>25 to you.</p>	<p>1 A Okay.</p> <p>2 Q And then we have another Schedule K-1, Tax Year</p> <p>3 1994, related to Beverly Hills Magazine and Walter Kaye; is</p> <p>4 that correct?</p> <p>5 A Yes, sir.</p> <p>6 Q I'm going to mark that as WK-7.</p> <p>7 (Grand Jury Exhibit No. WK-7 was</p> <p>8 marked for identification.)</p> <p>9 BY MR. WISENBERG:</p> <p>10 Q And I have done so; is that correct?</p> <p>11 A Yes, sir.</p> <p>12 Q And will you agree with me that the first K-1 form</p> <p>13 we marked as WK-5 is for 1993 tax year, correct?</p> <p>14 A Yes, sir.</p> <p>15 Q And then we've got WK -- well, we've got, it looks</p> <p>16 like, a share --</p> <p>17 A Looks like a stockholder's dividend.</p> <p>18 Q Right, for 50 shares of the Beverly Hills Magazine</p> <p>19 in your name.</p> <p>20 A Yes, sir.</p> <p>21 Q Okay. I'm going to mark the bottom of that as</p> <p>22 WK-8; is that correct?</p> <p>23 A Yes, sir.</p> <p>24 (Grand Jury Exhibit No. WK-8 was</p> <p>25 marked for identification.)</p>

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<p>1 BY MR. WISENBERG:</p> <p>2 Q Then we have a check -- we have a document that is</p> <p>3 a copy, two pages. The first page is the front, the second</p> <p>4 page is the back of a check from you to Marcia Lewis dated</p> <p>5 November 25, 1996, for \$10,000; is that correct?</p> <p>6 A Yes, sir.</p> <p>7 Q All right. I'm marking that as WK-9; is that</p> <p>8 correct?</p> <p>9 A Yes, sir.</p> <p>10 (Grand Jury Exhibit No. WK-9 was</p> <p>11 marked for identification.)</p> <p>12 BY MR. WISENBERG:</p> <p>13 Q All right. Do you remember offhand what that is</p> <p>14 for, or what that \$10,000 was for to Marcia Lewis?</p> <p>15 A Yeah, I had sort of felt badly for her or</p> <p>16 something, and I -- I just gave her a gift of \$10,000.</p> <p>17 Q Okay. That's around Thanksgiving of '96, correct?</p> <p>18 A Yeah, November '96, right.</p> <p>19 Q Then we've got a Volume I, No. 1, of Beverly Hills</p> <p>20 Magazine, a magazine you invested in, with Arnold</p> <p>21 Schwarzenegger on the cover; is that correct?</p> <p>22 A Yes, sir.</p> <p>23 Q Are you going to be terribly upset if I put an</p> <p>24 exhibit sticker on the magazine?</p> <p>25 (Laughter.)</p>	<p>1 street address, but just the city and the state.</p> <p>2 A Okay. New York City, New York State.</p> <p>3 Q And are you married?</p> <p>4 A I am married.</p> <p>5 Q And what is your wife's name?</p> <p>6 A Selma, S-e-l-m-a.</p> <p>7 Q And are you currently employed?</p> <p>8 A Am I employed? Technically I'm employed.</p> <p>9 Q Okay. And what do you do?</p> <p>10 A Well, I have to give you a few little explanations.</p> <p>11 Q Sure.</p> <p>12 A We had sold our business a number of years ago, and</p> <p>13 they kept me on under a consulting agreement, and my title is</p> <p>14 "chairman emeritus."</p> <p>15 Q Of what company?</p> <p>16 A Let's see, they changed the name of the firm after</p> <p>17 we sold it. I'm trying to remember. Kaye Insurance LP.</p> <p>18 Q That's K-a-y-e like your name?</p> <p>19 A That's right.</p> <p>20 Q Kaye Insurance LP.</p> <p>21 A Right.</p> <p>22 Q And you started that company when?</p> <p>23 A That particular company? Well, the predecessor --</p> <p>24 Q The predecessor.</p> <p>25 A The predecessor company was Walter Kaye Associates,</p>
Page 18	Page 20
<p>1 A I'm not allowed to say anything, so you can do it.</p> <p>2 (Laughter.)</p> <p>3 I apologize.</p> <p>4 Q All right.</p> <p>5 (Grand Jury Exhibit No. WK-10 was</p> <p>6 marked for identification.)</p> <p>7 THE WITNESS: It was a short-lived publishing</p> <p>8 business. Not so short-lived, though.</p> <p>9 Q We have now Volume I, No. 2, of Beverly Hills</p> <p>10 Magazine; is that correct?</p> <p>11 A Yes, sir.</p> <p>12 Q With three female models on the cover.</p> <p>13 A Yes, sir.</p> <p>14 Q I'm going to mark that as WK-11; is that correct?</p> <p>15 A Yes, sir.</p> <p>16 Q Okay.</p> <p>17 (Grand Jury Exhibit No. WK-11 was</p> <p>18 marked for identification.)</p> <p>19 BY MR. WISENBERG:</p> <p>20 Q Now that we've got that out of the way, I'm going</p> <p>21 to turn you over to Ms. Wirth for questioning.</p> <p>22 A Sure.</p> <p>23 BY MS. WIRTH:</p> <p>24 Q Mr. Kaye, can you tell the grand jury where you</p> <p>25 reside, where your home is? And you don't have to give us a</p>	<p>1 Inc. And I've got to think back a long time. Not when I</p> <p>2 went into the insurance business, when I started this</p> <p>3 particular company, right?</p> <p>4 Q Okay.</p> <p>5 A Again, you can't hold me to the exact date because</p> <p>6 I don't remember. I would say probably somewhere in the</p> <p>7 1950s.</p> <p>8 Q Okay. And ultimately you sold that company; is</p> <p>9 that correct?</p> <p>10 A Yes.</p> <p>11 Q And it is now known as Kaye Insurance LP?</p> <p>12 A Yes. We dropped the Walter.</p> <p>13 Q All right. And you're chairman emeritus.</p> <p>14 A Chairman emeritus.</p> <p>15 Q Okay. And approximately when did you sell the</p> <p>16 company?</p> <p>17 A We sold the company -- let's see, six years -- I</p> <p>18 would say somewhere about -- between November and December of</p> <p>19 '91. I should say my memory is terrible about that.</p> <p>20 Approximately.</p> <p>21 Q Approximately, okay. And you mentioned insurance.</p> <p>22 Any particular type of insurance business was this?</p> <p>23 A Well, we were general insurance brokers. I suppose</p> <p>24 -- I mean, I assume everybody knows what an insurance broker</p> <p>25 is. We did a very general business, and we also did life and</p>

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1 group business. But the bulk of our business was the
2 property and casualty business.

3 Q Okay. And before Walter Kaye Associates in the
4 '50s, did you also do insurance work elsewhere?

5 A Yes, since 1936. I've been in it a long time.

6 Q Okay. And did you have your own company at any
7 time prior to the '50s or did you work elsewhere?

8 A I went into a partnership -- I can't tell you the
9 exact date -- and the name of the firm was Kabat Kaye,
10 K-a-b-a-t K-a-y-e.

11 And prior to that I was with a firm called The
12 Equitable Brokerage Company, where I started as an ordinary
13 employee and eventually became a partner.

14 Q Okay. So this has been your life-long work, the
15 insurance business?

16 A Right.

17 Q All right. Other than your work as chairman
18 emeritus of Kaye Insurance LP, do you have other titles or
19 jobs?

20 A In this office?

21 Q No. Other than your work at Kaye Insurance, are
22 there jobs that you do or other titles that you hold?

23 A Yes.

24 Q And what are they?

25 A I'm what is known as a CASA, or a civilian aide to

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1 the Secretary of the Army, for New York State South.

2 Q And how long have you held that title?

3 A Again, you can't hold me exactly. I would say
4 somewhere about three years.

5 Q About three years?

6 A Yeah, about three years.

7 Q And how did you obtain that appointment?

8 A I was appointed by the -- the official appointment
9 came from the Secretary of the Army, Togo West, Jr.

10 Q And do you receive remuneration for this work?

11 A Not -- no pay.

12 Q Okay.

13 A In fact, I don't even let them pay me my expenses.
14 Once a while, I may, if they put me on a military plane, but
15 I --

16 Q And what your duties as civilian aide to the
17 Secretary of the Army for Southern New York State?

18 A Can I show you something that will explain my
19 duties? I am really a good will ambassador between the
20 public and the Army, because I could talk to you for weeks
21 about the Army. The greatest human beings I've ever met.

22 That's it, but on the back of that card, the
23 identification card, outlines my duties.

24 Q All right. Do you want to read those to the grand
25 jury?

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1 A Sure. "The function of each civilian aide is to
2 link the Army with the public, to explain to the public Army
3 missions, traditions, purposes, and policies, to advise Army
4 leaders concerning public attitudes and perception."

5 That's exactly what I do and I love it.

6 Q Have you ever been a member of the Armed Forces
7 yourself?

8 A No. I was for a very, very short time in '43. I
9 was in the Navy.

10 Q Okay. Did you have investiture when you were
11 appointed to this position?

12 A Yes, I sure did.

13 Q Do you know whether Monica Lewinsky attended the
14 investiture?

15 A Yes, she was there.

16 Q Okay. Where did that take place?

17 A At West Point.

18 Q And was her mother there as well?

19 A Her mother was there.

20 Q Was her aunt Debra --

21 A Her aunt was there.

22 Q That's Debra Finerman.

23 A Debra Finerman.

24 Q Okay. I'm going to ask you some questions about --
25 well, strike that. Before I do that, other than your work as

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1 chairman emeritus for Kaye Insurance and other than your work
2 as civilian aide to the Secretary of the Army, are there any
3 other jobs, functions, titles that you hold?

4 A I'm on the board of directors of our cooperative in
5 New York. No -- you know, no money.

6 Q Okay. It's a common affliction in Manhattan.

7 A Right.

8 Q Okay. Other than that?

9 A Well, I just became a member of the West Point

10 Association. Of course, we made a very nice contribution.

11 I'm a great supporter of West Point, great supporter of the
12 whole Army.

13 Other than that -- let me see. Oh, I've gotten

14 some honorary -- I'm an honorary entityman, you know, from
15 the First Army. I don't even -- can't even tell you exactly
16 how many honorary military, you know, titles I have.

17 Q So things of that nature.

18 A Things of that nature.

19 Q Okay. I'm going to ask you some questions now
20 about telephone numbers that you've used over the past few
21 years beginning in 1995.

22 First off, do you have a telephone number that y
23 use for business purposes?

24 A What do you mean by that? A number that I call?

25 Q Well, let's begin with Kaye Insurance LP. Do you

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1 have a telephone there?
 2 A Sure.
 3 Q Do you have an office there?
 4 A Sure.
 5 Q Do you go to the office regularly?
 6 A Sometimes I'll go every day and sometimes I won't
 7 go for weeks.
 8 Q Where is your office located?
 9 A 122 East 42nd Street. If you're familiar with New
 10 York, 42nd and Lexington, the Channon Building.
 11 Q Okay. And do you have a secretary there?
 12 A I do have a secretary.
 13 Q Do you also have like an answering machine or a
 14 voice mail?
 15 A Yes, I have that, too.
 16 Q What is the telephone number there?
 17 A 212 -- my direct dial number is [REDACTED] I
 18 don't know the switchboard number, but that's the number I --
 19 Q All right. [REDACTED]
 20 A [REDACTED]
 21 Q -- [REDACTED] That's the general number?
 22 A No, that's my direct dial number. I don't even
 23 know the switchboard number anymore. I rarely ever use it.
 24 Q Okay. Do you also use a number, [REDACTED]
 25 A It's not familiar to me, unless it's our fax

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1 number. But I don't know, I don't know. I know I have a fax
 2 number.
 3 Q Well, it has the same three-digit prefix, [REDACTED] --
 4 A Yeah.
 5 Q -- as the [REDACTED] number. So you know of no other
 6 direct telephone lines other than [REDACTED]
 7 A Right.
 8 Q Can you find out for us whether [REDACTED] is a fax
 9 number?
 10 A Sure. You want me to call or --
 11 Q I'll write that down for you. Not at this moment,
 12 maybe on a break --
 13 A Okay.
 14 Q -- if it possible for you to do that.
 15 A Sure. Although my secretary's not in today, but
 16 I'll try to track her down.
 17 Q Okay. All right. Are there any business phones
 18 that you use besides [REDACTED]?
 19 A I use my home number.
 20 Q Okay. What is that?
 21 A [REDACTED] -- and the reason I'm hesitating, we just
 22 changed it and went to an unlisted number.
 23 Q Okay.
 24 A I was harassed so by the press and --
 25 Q Okay.

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1 A [REDACTED]
 2 Q I'm sorry. I'm just going to ask you to give us
 3 the number before you changed it for now.
 4 A Yeah, I still remember that. [REDACTED]
 5 Q All right. That's your home telephone number?
 6 A Home telephone number.
 7 Q Okay. And just so our record is complete, what is
 8 your current number?
 9 A [REDACTED] That's an unlisted number.
 10 Q Okay. And when did you change that, that number to
 11 the unlisted number?
 12 A I'd say maybe two, three months ago --
 13 Q Okay.
 14 A -- because it had gotten impossible.
 15 Q Okay. Now, are you familiar with any phone number,
 16 [REDACTED]?
 17 A [REDACTED] --
 18 Q [REDACTED]
 19 A [REDACTED] Not offhand.
 20 Q If we have records that show that is a phone number
 21 in your name, does that make any sense to you?
 22 A A number in my name.
 23 Q Yes.
 24 A There's another Walter Kaye in New York, by the
 25 way, exact same name, exact spelling.

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1 What's the number? [REDACTED]
 2 Q [REDACTED] Have you ever used that telephone
 3 number?
 4 A I don't remember ever using it.
 5 Q Would there be another number in 1995 that you
 6 would have used, [REDACTED]
 7 A To the best of my memory, the answer is no, but I'm
 8 not 100 percent sure.
 9 Q That's not a --
 10 A Was the number listed in my name?
 11 Q Our records show that it is.
 12 A At the same address?
 13 Q Well, I don't know that. But [REDACTED]
 14 A [REDACTED] maybe our switchboard number.
 15 Q Can you find that out, too?
 16 A Sure.
 17 Q Okay.
 18 A What's that number you want me to check?
 19 Q Thank you. It's [REDACTED] --
 20 A [REDACTED] --
 21 Q -- [REDACTED] --
 22 A -- [REDACTED] --
 23 Q -- [REDACTED] --
 24 A -- [REDACTED] What was the other question you asked?
 25 You want my switchboard number.

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1 Q Well, yes, I'd like that.
 2 A There may have been --
 3 Q But I'm just wondering if you could find out also
 4 if that number you just wrote down is your switchboard
 5 number.
 6 A You want me to make the call now or wait?
 7 Q Let's go through the phone numbers and then we can
 8 take a break, okay?
 9 A Go ahead.
 10 Q Okay. Actually, I'll ask you a bunch of background
 11 questions, and then we'll take a break --
 12 A Right.
 13 Q -- and you can do that. Thank you.
 14 All right. Do you have any 800 numbers that you
 15 use?
 16 A In the office? Sure.
 17 Q Anywhere. You do.
 18 A Oh, I use 800 numbers tremendously.
 19 Q No, not that you use, but that someone can call
 20 you.
 21 A But we have an 800 number in the office.
 22 Q Do you know what it is?
 23 A Yes. It's [REDACTED] I don't know what the
 24 numbers that relate to the [REDACTED]
 25 Q Oh.

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1 A You'll have to figure that out.
 2 Q All right, well, we'll also do that on the break.
 3 Can you write this number down?
 4 A Yes. You want me to get you the numbers for KAYE,
 5 right?
 6 Q Yes, but I'm going to give you a number and ask you
 7 to check on the telephone whether that's the number.
 8 A --
 9 Q [REDACTED]
 10 A -- [REDACTED]
 11 Q [REDACTED] Just write down [REDACTED] --
 12 A [REDACTED]
 13 Q -- and see if that matches.
 14 A Okay.
 15 MR. WISENBERG: It sounds like it would.
 16 MS. WIRTH: Yes, it sounds like it would.
 17 BY MS. WIRTH:
 18 Q Okay. Do you have any other homes other than your
 19 home in New York?
 20 A No.
 21 Q Are there any other places that you stay in the
 22 metropolitan area in New York on a regular basis?
 23 A No.
 24 Q Do you have any relatives that you frequently stay
 25 with?

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1 A I never stay with any relatives.
 2 Q Do you know anybody in the 914 area by the name of
 3 Kaye, whose last name is Kaye?
 4 A In 914 --
 5 Q 914 area code.
 6 A 914?
 7 Q Yes.
 8 A The reason I say that, we lived in 914 for years.
 9 Q Okay.
 10 A Oh, the same phone whose name is Walter Kaye -- the
 11 craziest thing, he lives in Westchester. He has a home in
 12 Westchester and a home in New York.
 13 Q Is that right? Do you know anybody named Heidi
 14 Kaye?
 15 A Never heard of that name. That's in Westchester?
 16 Never heard of it.
 17 Q Well, 914, which could be Rockland County, I guess,
 18 as well.
 19 A Oh, yeah. Excuse me. I apologize. It goes all
 20 the way Upstate?
 21 Q It does, both sides of the river.
 22 Are you familiar at all with any phone number, [REDACTED]
 23 [REDACTED]
 24 A I've never heard of that either. You want me to
 25 write that down, too?

Page .

1 Q 914 --
 2 A 914 --
 3 Q -- [REDACTED] --
 4 A -- [REDACTED]
 5 A Never heard of that.
 6 Q Okay.
 7 A But I imagine you people can find that out very
 8 easily, in whose name it's registered. But I never heard of
 9 those numbers. I'm terrible. I hardly remember my own
 10 number.
 11 Q Do you know the other Walter Kaye?
 12 A I have met him once or twice.
 13 Q What does he --
 14 A What happened was -- excuse me.
 15 Q I'm sorry, go ahead.
 16 A What happened was, I get a call from this guy one
 17 day. He says, "Are you Walter Kaye?" I said, "I'm Walter
 18 Kaye." He said, "I'm Walter Kaye, too." I said, "Oh, that's
 19 very nice." He says, "I'm in the finance business." He
 20 says, "I know all about you. You're in the insurance
 21 business."
 22 And he said -- and that's the way we became
 23 friendly -- not friendly. I never have seen him socially,
 24 but that's when he told me that he had an apartment in New
 25 York and also in Westchester.

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1 Q Do you know if the Lewinsky family knows the other
2 Walter Kaye?
3 A I don't know.
4 Q Okay.
5 A I don't know.
6 Q Have you ever met the other Walter Kaye face-to-
7 face?
8 A Yes. I either met him once or twice. I don't
9 think we ever -- we may have went out once socially, I don't
10 remember.
11 BY MR. WISENBERG:
12 Q But you don't know a Heidi Kaye?
13 A Never heard of her, no.
14 Q And no one that you know -- well, you don't have
15 any numbers listed in the name of Heidi Kaye.
16 A When you say I don't have any numbers? Never heard
17 of her.
18 Q Okay.
19 A I don't know who she is.
20 Q All right.
21 A Have they been charging their phones to my number?
22 (Laughter.)
23 Q That's a matter for the New York District Attorney.
24 A I apologize. I'm sorry.

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1 BY MS. WIRTH:
2 Q All right. I'm going to switch to a different
3 subject for a moment. Are you active in politics in any way?
4 A Yes, I am.
5 Q Okay. And can you tell the grand jury basically
6 what your activities in politics have been over the years?
7 A Well, I was never active in politics until I became
8 involved with the Democratic National Committee. And, of
9 course, the amount of money I gave, they gave me this great
10 title of "managing trustee."
11 Q And when was that?
12 A Again, you know, my -- I would say '93, '94.
13 Q Okay. And you said you've given a large amount of
14 money to the Democratic National Committee? Is that true?
15 A That's true.
16 Q Approximately how much have you given?
17 A Well, I never knew, but according to the papers, I
18 gave about \$300,000.
19 Q Does that sound accurate to you?
20 A That sounds about accurate.
21 Q Okay. And have you contributed to any particular
22 campaigns?
23 A I remember giving a check, was it Clinton-Gore or
24 something? But I don't remember the amount.
25 Q And this is for the '92 election?

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1 A When was the -- no, I didn't even know them yet. I
2 didn't get to know anybody till '93.
3 Q Okay. So for the '96 election then.
4 A Yeah.
5 Q Okay. So you just a moment ago that you had met
6 the Clintons?
7 A Yes, I know the Clintons.
8 Q All right. And when did you meet them?
9 A Again, you know, all approximations, you know. The
10 best of my memory, right? I imagine I met them '93, '94, at
11 the end of '93. Let's see, how did I -- I should remember
12 that vividly, I suppose. Certainly it was '93 or '94.
13 Q Okay. And where did you meet them?
14 A Now let me see what happened. I'm trying to think
15 how I met them the first time. I used to know these things
16 at my fingertips.
17 I'll tell you what happened. I was going through a
18 very, very difficult emotional period. I had suffered a
19 heart attack, and they sold the business and I was pushed out
20 right away. A very emotional thing, you know. You start a
21 business from scratch, and I don't want to brag, but we did
22 have a very nice business. And I was in bad shape.
23 And one day I went to a fundraiser, nothing to do
24 with the President and Mrs. Clinton. It's a hard story to
25 believe, but I remember that. This man was running for the

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1 mayor of Louisville, Kentucky, and -- let's see if I remember
2 his name -- Sloane. And we were friends with a couple who
3 invited us to their home to -- I don't know if you know about
4 these things, but, you know, they always have these cocktail
5 parties and things, and you make a contribution.
6 And I went to this party and I gave \$500, never
7 thinking anything more about it. That was probably in '93.
8 And about two or three weeks later, I'm having breakfast at a
9 hotel in New York, and this young woman comes up to me and
10 says to me, "Aren't you Walter Kaye?" I said, "I'm Walter
11 Kaye." She said to me, "You know, I'd like to talk to you."
12 I said, "If you're looking for money, I've given it away for
13 the whole year. I'm involved with a lot of charities."
14 She said, "No, I want to talk to you about becoming
15 active in politics." I said, "I want to tell you, if there's
16 anything I'm not interested in it's politics. Just leave me
17 alone."
18 So she says, "Can't you be polite and listen?" So
19 she said, "I would like you to meet David Wilhelm," who at
20 that time was Chairman of the Democratic Party. I don't know
21 if you remember that. I figured to myself, you know, I've
22 got plenty of time, you know. I'm not that busy.
23 So I said, "I'll tell you what. If David Wilhelm
24 will come to see me, I would be happy to talk to him." I
25 said, "I know what's going to happen" -- because I've been in

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1 the service business my whole life. You don't really meet
2 the boss unless you -- you know, you can spend a lot of
3 money. I said, "But I'm sure that Mr. Wilhelm will -- you
4 know, will cancel the night before." She said, "Absolutely
5 not."

6 And, of course, that's what happened. Wilhelm
7 canceled, and they sent up somebody else, a young woman --
8 I'm not even -- I don't even really remember her name, Kathy
9 something -- and she starts to give me, you know, the reasons
10 why I should become active in politics -- or make a
11 contribution, excuse me, to the Democratic National
12 Committee.

13 So I remember what I told her. I said, "Listen,
14 I'm an excitement nut. I like excitement. You offer me some
15 exciting times, I will give you a contribution."

16 And what do you think happens? She said, "I'll
17 tell you what." She said, "If you like excitement, Mrs.
18 Clinton is speaking at the Mayflower Hotel" -- was it the
19 Mayflower? Oh, yes -- "to the Women's Leadership Forum. Why
20 don't you come as our guest?"

21 You know, this is at the height of everything.
22 And, to me, listen, it was a very exciting thing to meet the
23 President's wife, you know.

24 So I go down to the Mayflower Hotel, and they
25 really set me up. I mean, they're working on me, you know.

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1 (Laughter.)

2 This is so that I can tell you just exactly what
3 happened. I'm not out of bounds or anything, right?

4 Q Okay.

5 A I'm going to tell you what I think of this. And as
6 soon as I get there, I know, boy, they're really working on
7 me. They put me in the first row for the lecture, and it's
8 the Women's Leadership Forum, and very intelligent people,
9 you know, bank presidents, college presidents, attorneys,
10 judges. And I become intrigued with the thing, and they
11 asked some terrific questions.

12 At that time they were talking about the health
13 program, and I started to enjoy it. And then at about 10:30
14 I go out to get a cup of coffee, and one of the people from
15 the Democratic Party, a young lady, says, "Mr. Kaye, we'd
16 like to invite you to meet Mrs. Clinton." Mrs. Clinton, boy,
17 that's really something. And I said, "No, I really don't" --
18 she said, "Don't be silly. You're here. Why don't you meet
19 me back here at 11:30? We'll take you back to meet Mrs.
20 Clinton."

21 So I go. And, again, I'm telling you -- I
22 suppose -- I don't know if you people -- I never saw this
23 before. You know, the dogs sniffing out the place, the
24 Secret Service all over the place. You know, she hadn't
25 arrived yet. And there must have been -- I don't know -- 20,

1 25 people in this room.

2 We went to a private suite at the Mayflower, and
3 sure enough, she came in, and I'm very, very excited, you
4 know, and we chatted for a minute, and I was really
5 overwhelmed. I'm telling you the truth.

6 And then when I walked into the luncheon, what do
7 you think they do? They seat me at her table. I'm telling
8 you. They should be in the insurance business.

9 (Laughter.)

10 Don't laugh, because I got too much pain. And,
11 boy, I love it. I'm telling you the truth, you know. I
12 heard her speak. I was very impressed. Never looked at a
13 note, you know, and very interesting. And here I'm sitting
14 right at the same table with her.

15 So I say goodbye to her, you know, and we start
16 talking, you know, and I suppose you realize that it's easy
17 for me to make conversation. That's my business, really.

18 And right after the luncheon, David Wilhelm
19 appeared on the scene. He took me upstairs, and I gave him a
20 contribution. I became a managing trustee of the Democratic
21 Party. That was my first check, I remember that. I don't
22 remember exactly.

23 But I'll tell you what really was the clincher. On
24 Saturday morning I get a call from the White House -- I don't
25 remember who -- if you recall, this is a time that they

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1 signed the peace treaty between Arafat, Rabin, and the
2 President. Remember, he brought them all together? And I
3 remember that because I got a picture of that, September of
4 '93.

5 And they said, "Mr. Kaye, we would like you to
6 attend" -- you know, it's beyond me, you know. And I got to
7 be at the White House 8:00, 9:00, and, naturally, I go. And
8 I just can't believe it. I'm telling you, I get goosebumps
9 as I tell you, although I've had such aggravation with this.

10 I go down and you walk on the grounds of the White
11 House, the flags are flying, the Marine Corps Band is
12 playing, helicopters all over -- you know, very, very
13 exciting. I happen to be a very, very patriotic guy. I feel
14 the greatest thing that happened to me was I live in this
15 country. I just love it.

16 And it must be a couple of thousand people, and the
17 excitement, you know, you have all these Arab sheiks walking
18 around in their garb, you know. Very, very exciting.

19 But I'm nothing. So they sit me way out in the
20 bleachers. I couldn't hear anything. I see Mrs. Clinton
21 there and the President, naturally, but I can't get close to
22 them.

23 And then -- I had a terrific time there. I'm going
24 to tell you the truth. And then that was the beginning of my
25 experiences with them.

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1 Q Okay. And did you eventually develop a personal
2 relationship with members of the First Family?
3 A I sure did.
4 Q Okay. And could you describe your relationship for
5 the grand jury with the First Family?
6 A What do you mean?
7 Q In terms of, you know, just like you would describe
8 your relationship with anything other person. You know, how
9 often you see them, are you personal friends?
10 A I didn't -- I mean, again --
11 Q Who are you close to? That sort of thing.
12 A I mean, you know, as part of the DNC, I'd be
13 invited to all the DNC functions. I got to know a lot of
14 people at the White House. I would go there.
15 Q Okay, we'll get into that in a moment.
16 A Okay.
17 Q But in terms of the First Family, the members of
18 the First Family, how would you describe your relationship?
19 Are you personal friends at the First Lady and the President?
20 A I would say more so Mrs. Clinton.
21 Q Okay.
22 A But I would never dare pick up the phone and call
23 the President, whereas, you know, I've called Mrs. Clinton a
24 number of times.
25 Q Okay. And she returns your calls?

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1 A She returns the calls.
2 Q Okay. And you see her from time to time?
3 A Not recently, but I have -- yes, we've seen her
4 from time to time.
5 Q And you've been to the White House on a number of
6 occasions?
7 A I have been to the White House, yes, many times.
8 Q Okay. And you know their daughter? Have you met
9 their daughter?
10 A I know Chelsea, yeah.
11 Q Okay.
12 A Nice kid, by the way.
13 Q Okay. And who else do you know at the White House?
14 A Oh, God, I know a lot of people there. I know Ann
15 McCoy.
16 Q Who is Ann McCoy?
17 A Ann McCoy, when I really got to meet her she was
18 with the Visitors Office, Visitors Bureau -- or Visitors
19 Office. I met Debi Schiff, I met Betty Currie. Let me see
20 who else. Maggie Williams, whom I haven't seen in years.
21 Q Do you know Nancy Hernreich?
22 A Yeah, I've met Nancy Hernreich, but never been out
23 with her socially. I've shaken her hand and --
24 Q Have you been out socially with Betty Currie?
25 A Yes.

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1 Q Okay. And Debi Schiff?
2 A Yes.
3 Q Ann McCoy?
4 A Yes.
5 Q And Maggie Williams?
6 A Maggie Williams, I would say yes.
7 BY MR. WISENBERG:
8 Q Marsha Scott?
9 A Marsha Scott? Never was out with her socially.
10 Q You know her, though?
11 A I just really met just -- it's interesting. I
12 wouldn't say that Marsha Scott was one of the people I knew
13 there. I met her at the time of the election.
14 BY MS. WIRTH:
15 Q The '96 election?
16 A The '96 election.
17 Q Have you had any connections with her, any reason
18 to talk to her, call her, that sort of thing?
19 A I tell you something happened that intrigued me
20 with her. I don't want to shock you.
21 I make a living, really, on my investments. And
22 when I saw her at the election she told me she was going to
23 Europe with a guy by the name of [REDACTED] I don't know
24 if some of you people would know the name, but he controls an
25 insurance company called [REDACTED] which

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1 is one of the great success stories of this country.
2 And I was intrigued by that. Here I'm in the
3 insurance business. We've never done business with them.
4 And that was really, you know -- I think I saw her
5 once after that, and I asked if she was still seeing him and
6 what kind of guy he was. I don't remember what she told me,
7 but she told me he was a very interesting man. The guy's a
8 genius, you know.
9 Q Does she make calls to you, though? Has she made
10 calls to you ever?
11 A I wouldn't say she would make calls to me.
12 Q Have you ever discussed Monica Lewinsky with her?
13 A To the best of my memory, I don't think so, but I
14 don't remember.
15 Q Okay. How about John Podesta?
16 A Never met him. I may have met him just to shake
17 his hand. I really don't even know his name except what I
18 see in the paper. Wasn't he the deputy chief of staff or
19 something or --
20 MR. WISENBERG: That's correct.
21 THE WITNESS: Mm-hmm, that's what I read in The
22 Times.
23 BY MS. WIRTH:
24 Q What about Karen Abramson?
25 A Karen Abramson.

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1 Q Do you know her?

2 A She's not on top of my list. At the White House?

3 Q Yes.

4 A Karen Abramson. I don't remember --

5 Q Do you know if she was someone who ran the Intern

6 Program at the White House for a time?

7 A Oh, now you refreshed my memory, right. I don't

8 remember if I ever met her, I wrote to her or called her or

9 what.

10 Q Okay.

11 A That's right, she was the name, right, right. See,

12 it's a good thing you refreshed my memory.

13 Q What about Lisa Caputo, do you remember --

14 A I know Lisa Caputo.

15 Q Who is she?

16 A Who is she?

17 Q Yes.

18 A When I met her she was the First Lady's press

19 officer, I think.

20 Q Okay. Have you ever given any personal gifts to

21 members of the First Family, not, you know, political

22 contributions in any way, shape, or form, but just personal

23 gifts?

24 A You mean, like a tie to the President or a scarf

25 for Mrs. Clinton?

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1 Q Yes, or money.

2 A Never gave any money. But we've given gifts to the

3 -- sure. I know my wife sends them Christmas presents.

4 Q It was reported in the press recently that you gave

5 a gift of stock, I think, to Chelsea Clinton; is that

6 correct?

7 A Coca-Cola.

8 Q Okay.

9 A Incidentally, before I did that, I checked with the

10 White House, and they said they're going to check with their

11 counsel. They came back and told me it's perfectly okay.

12 The reason I like to give stock to young kids was,

13 they get the dividend every three months, you know. I'm a

14 great believer in common stocks.

15 Q When is the last time you've been to the White

16 House?

17 A Oh, God, I haven't been there in a long time. Ever

18 since this thing broke, I decided I didn't want to go near

19 there or --

20 Q Okay.

21 A So it must be four, five months now.

22 Q And that was your own decision?

23 A That was my own decision, yeah.

24 Q Why do you feel that way?

25 A I don't know. I just didn't want to have any

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1 conversation with them. I was shocked about the whole thing,

2 you know, and I just didn't want to get into conversation

3 with them, just as a -- you know, my gut reaction.

4 Q Have you any had any contact since the Monica

5 Lewinsky incident became public in late January -- I think

6 January 21, 1998 -- have you had any telephone contact with

7 anybody from the White House?

8 A About Monica Lewinsky?

9 Q Any telephone contact at all. Let's start there.

10 A Yeah. I've spoken with Debi Schiff, Ann McCoy.

11 They call me to find out how I am. You know, they want to

12 know why I never come down anymore. And I just decided, you

13 know, it wasn't for me anymore.

14 Q Has the subject of Monica Lewinsky come up in any

15 of those conversations?

16 A I really don't remember.

17 Q Other than Ann McCoy and Debi Schiff, have you

18 spoken to anybody else at the White House since the Monica

19 Lewinsky affair became public? And by that I mean --

20 A I called Betty Currie once to find out how she is.

21 I don't know if I spoke to her or her husband.

22 Q Did you call her at home?

23 A I called her at home.

24 Q Did you discuss Monica Lewinsky during that

25 conversation?

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1 A No. Not to the best of my memory, now. I don't

2 want to say no emphatically. It's just like this Abramson

3 woman you just mentioned. You know, my memory --

4 Q You don't remember whether you spoke to Betty

5 Currie or her husband when you --

6 A About Monica Lewinsky?

7 Q Well, you said, "I don't know who I spoke to. I

8 called Betty Currie, but I don't remember who I spoke to."

9 A I don't remember. I remember definitely speaking

10 to him. I don't remember if I spoke to her or not.

11 Q Okay. Has she ever called you, Betty Currie, since

12 this happened, since this became public?

13 A Has she ever called me? No.

14 Q What about Bruce Lindsey?

15 A Bruce Lindsey called me once. He called me right

16 after the -- I never really knew him, by the way. Or I'd met

17 him -- I shouldn't say -- yeah, I suppose I did. I met him

18 at a couple of parties.

19 He called me once right after this thing broke. He

20 said, "Hey, Walter, I want to talk to you about Monica

21 Lewinsky." So I said, "What about?" He said, "'Just a

22 minute." He came back, he said, "Listen, I have to tak

23 another call." He never called me back.

24 Q Okay. And you never called him back.

25 A Never called him back.

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<p>1 Q Okay. Do you remember when that was, 2 approximately? 3 A No. I would be sometime after -- probably right in 4 the excitement of -- you know, when it just happened, but I'm 5 not sure, I'm not sure. 6 Q Okay. Let's talk about the Lewinsky family for a 7 little while. Which member of the family -- and I'm 8 including Monica, her mother Marcia, Debra Finerman, any of 9 their spouses, excluding Monica -- who did you meet first of 10 the family? 11 A I think it was Marcia. 12 Q Marcia Lewis? 13 A Yeah. 14 Q Where did you meet her? 15 A I met her in California. 16 Q Do you have a home out there? 17 A Do I have a home there? 18 Q Yes. 19 A No. 20 Q Do you frequently -- 21 A We have only one home. 22 Q Oh, okay. You frequently visit out there, though? 23 A We used to when I was active in the business. We 24 had an office out there. 25 Q I see.</p>	<p>1 Walter." And he said, "I was wondering if Marcia Lewis and 2 her sister" -- I didn't even know Marcia too well at that 3 time. I really, again, don't remember. 4 He says, "You think they could join you for 5 dinner?" I said, "Listen, we have a full table. We just 6 can't do it." He said, "Can't you invite them up for a drink 7 at intermission?" So, you know, client, you know, and -- so 8 we invited them up, and that's where I saw Debra Finerman the 9 first time. 10 Q Okay. And how long after you met Marcia did you 11 meet Debra? Soon after or a long time or -- 12 A It's hard for me to say. 13 Q In the vicinity of 10 years ago, we're talking? 14 A God, it's just very difficult for me to pin down 15 the time. What's your question again? Give me -- 16 Q Well, you said you met Marcia, you think maybe, 17 something like 10 years ago. Was Debra around that time or 18 later? 19 A Well, I didn't meet her originally till I saw them 20 in New York. So that had to be years later. 21 Q It was years after you met Marcia? 22 A Yeah. How many? I don't remember. 23 Q Okay. Can you tell the grand jury what your 24 relationship with Marcia Lewis has been over the years. Were 25 you friends right away, not right away?</p>
Page 50	Page 52
<p>1 A But I rarely go there now. 2 Q So how did you meet Marcia? Who introduced you? 3 A A man by the name of Joseph Sinay, S-i-n-a-y. 4 Q And who is he? 5 A He's a friend of mine who was a client, you know, 6 and we became friendly, you know, typical of our business. 7 And I don't know the exact circumstances that he introduced 8 me to Marcia, but he's the one who introduced me to her. 9 Q Do you remember when that was? 10 A No. I want to say off the top of my head, maybe 11 10, 12 years ago. I don't know. I really can't remember 12 that. 13 Q Okay. And was that in the Beverly Hills/Los 14 Angeles area? 15 A Yeah. 16 Q Okay. And who did you meet next after Marcia? Did 17 you meet Monica, Debra, anybody else? 18 A I didn't meet Monica until when she arrived in 19 Washington. I met Debra next. 20 Q Okay. And where did you meet her? 21 A It's also an interesting story. Joe Sinay called 22 me one day to tell me that Marcia Lewis and her sister were 23 going to the opening of the opera, Metropolitan Opera in New 24 York. And my wife and I had been patrons for many, many 25 years, and he said, "I know you're going to be there,</p>	<p>1 A Yeah, we became friendly right away. 2 Q Did you see her from time to time? She was living 3 in Los Angeles at that time? 4 A I never really saw her -- maybe take her out to 5 dinner once in a while, but not on a regular basis or 6 anything like that. 7 Q And there came a time -- you brought some documents 8 here today. There came a time when you invested in a 9 magazine that Marcia and Debra started, right? 10 A That's right. By that time I had met Debra. 11 Q Okay. And that magazine was called the Beverly 12 Hills Magazine? 13 A What year was that? 14 Q Well, these two exhibits, WK-10 and WK-11, have 15 dates. 16 MR. WISENBERG: Let me say that WK-11 has -- which 17 is Volume 1, No. 2, says, "Hillary's Inaugural Ball 18 Makeover." So that would at least indicate -- 19 THE WITNESS: There's no date to the magazine. 20 MS. WIRTH: For the record, not on the cover. 21 MR. WISENBERG: On page 1 it says, "Copyright 22 1992." That's WK-11. Copyright '92, but the story is 23 "Hillary's Inaugural Ball Makeover." So that would at least 24 imply that the President had been elected -- 25 THE WITNESS: The first term.</p>

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1 MR. WISENBERG: -- the first term.
 2 BY MS. WIRTH:
 3 Q And, in fact, on WK-11, which is Volume I, No. 2,
 4 it looks like page 3, there's a page entitled, "Message to
 5 the Editors." That's a picture of Marcia Lewis and Debra
 6 Finerman, correct?
 7 A Right.
 8 Q Okay. So, anyway, you invested in this magazine,
 9 and you brought documents which indicated that you invested
 10 \$30,000 in that magazine?
 11 A Right.
 12 Q Was that a loan or an investment?
 13 A No, that was an investment.
 14 Q Okay.
 15 THE FOREPERSON: Ms. Wirth, it's time for a break.
 16 MS. WIRTH: Sure.
 17 BY MS. WIRTH:
 18 Q Can you check those phone numbers for us?
 19 A Sure.
 20 Q We're going to take a break and --
 21 A There's only one thing I want to tell you, that my
 22 secretary is not in today. I'll try to reach her.
 23 Q We'll try. Anybody else that --
 24 A Is there a phone booth outside?
 25 Q Yes. There's a phone in the hallway.

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1 A You want me to walk out and do it now?
 2 Q Yes.
 3 MR. WISENBERG: We'll come get you when we're ready
 4 to start.
 5 BY MS. WIRTH:
 6 Q We'll come get you when we're ready.
 7 A In other words, you don't want me to come back
 8 automatically.
 9 Q Right. We'll come and get you.
 10 MR. WISENBERG: Thank you, Mr. Kaye.
 11 THE WITNESS: You're welcome.
 12 (A brief recess was taken.)
 13 (Witness excused. Witness recalled.)
 14 MR. WISENBERG: Madam Foreperson, do we have a
 15 quorum?
 16 THE FOREPERSON: Yes, we do.
 17 MR. WISENBERG: Are there any authorized human
 18 beings in the grand jury room.
 19 THE FOREPERSON: There are no unauthorized human or
 20 even non-human beings in the jury room.
 21 MR. WISENBERG: Thank you.
 22 THE FOREPERSON: Mr. Kaye, you're still under oath.
 23 THE WITNESS: Yes.
 24 I just want to report back to you about the
 25 numbers. The [REDACTED] number was a former switchboard number

1 of ours.
 2 BY MS. WIRTH:
 3 Q And when you say "of ours," you mean Kaye Insura
 4 LP7
 5 A Kaye Insurance, yeah.
 6 Q All right.
 7 A And the [REDACTED] is our fax number.
 8 Q Okay. When you say "our," that's the business fax
 9 number?
 10 A Yeah, again, the business fax number.
 11 Q All right. Do you have any knowledge as to when
 12 that switchboard number --
 13 A No. I could find out for you.
 14 Q -- was in effect or --
 15 A Because I don't remember dates.
 16 Q Okay. But it's been within the past few years that
 17 it's been an active number.
 18 A You mean the [REDACTED] or the other one?
 19 Q No, [REDACTED] that's been used till fairly --
 20 A Until we went to this new number, which I don't
 21 even remember how long ago it is.
 22 Q Is it within the last year, the switch?
 23 A Probably more than a year. There's no problem if I
 24 get the office manager to find out.
 25 Q Okay.

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1 A But it's -- that definitely was our old switchboard
 2 number.
 3 Q Okay, all right. I think when we broke we were
 4 talking about the Beverly Hills Magazine, correct?
 5 A Right.
 6 Q And you brought with you -- one of the documents
 7 you brought with you is a copy of a check. And this is Grand
 8 Jury Exhibit WK-4 that I'm going to show you for a moment,
 9 right?
 10 A Yes.
 11 Q And that reflects a \$30,000 contribution --
 12 A Investment.
 13 Q -- investment, excuse me --
 14 A What's the date on that check?
 15 Q -- to the Beverly Hills Magazine. You can read the
 16 date. What is it?
 17 A Yeah, '93, April 21, '93.
 18 Q April 21st of 1993.
 19 A Yeah. That was the investment I made in the
 20 magazine.
 21 Q And you were also a minority shareholder in the
 22 magazine. Is that true?
 23 A You think I know? Whatever I was there.
 24 Q Pardon me?
 25 A Yeah, I was a minority stockholder.

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1 Q Okay.
 2 BY MR. WISENBERG:
 3 Q I take it that the investment didn't pay off?
 4 A I would say you're 100 percent right.
 5 BY MS. WIRTH:
 6 Q I'm going to show you Grand Jury Exhibit WK-6 for a
 7 moment, which is that S Corporation Election or
 8 Termination/Revocation document that Mr. Wisenberg showed you
 9 earlier, that we don't quite know exactly what it is. But it
 10 reflects here under item -- it looks like item -- I don't
 11 know -- anyway, the last listed items.
 12 There are three names listed: Marcia Lewis, Debra
 13 Finerman, and Walter Kaye. And number of shares, Marcia
 14 Lewis, 500; is that correct?
 15 A That's what it says, yeah.
 16 Q Debra Finerman, 500; is that correct?
 17 A Right.
 18 Q And Walter Kaye, 50.
 19 A Right. So I was really a minority stockholder.
 20 Q All right. And this document -- it states at the
 21 top it's effective for the incoming year beginning April 19th
 22 of '93.
 23 A I assume that's right.
 24 Q That's what it says, okay.
 25 All right. Why did you invest \$30,000 in this

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1 magazine?
 2 A I had gotten to know them, and they -- I just
 3 wanted to be very nice.
 4 Q Okay. And when you say "them," you mean the two
 5 sisters, Marcia and Debra?
 6 A Yeah, more so Debra.
 7 Q More so Debra. Of the two sisters, you were closer
 8 to her than you were to Marcia.
 9 A Yes.
 10 Q All right. Tell us about your relationship with
 11 Monica Lewinsky. When do you remember first meeting her?
 12 A I remember meeting her, I think, after she had
 13 graduated from college. So, I don't know, two, three years
 14 ago, I suppose, when they moved to Washington.
 15 Q Okay. When you say "they," you mean she and her
 16 mother.
 17 A She and her mother moved to Washington.
 18 Q And they lived in the Watergate Apartments?
 19 A They lived in the Watergate.
 20 Q Okay. And after they moved to Washington, did you
 21 see them on a regular basis?
 22 A Not on a regular basis. I would see them once in a
 23 while.
 24 Q Okay. About how often?
 25 A I can't tell you that.

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1 Q Okay. Can you describe your relationship for the
 2 grand jury with Monica? What was it like?
 3 A Young kid, you know, and it was really because of
 4 her mother and her aunt I even knew her.
 5 Q Okay. How did she refer to you? Did she call you
 6 "Mr. Kaye" or "Walter" or "Uncle Walter" or --
 7 A Never called me Uncle Walter.
 8 BY MR. WISENBERG:
 9 Q To your face, at least.
 10 A Huh?
 11 Q To your face.
 12 BY MS. WIRTH:
 13 Q To your face.
 14 A Never called me that to my face, never.
 15 Q Okay. How did she refer to you?
 16 A She probably called me Walter. You know, I don't
 17 even remember. Walter or Mr. Kaye, but not Uncle Walter.
 18 I'd be very sensitive about that.
 19 Q Okay. Now, you're familiar with the internship
 20 program at the White House?
 21 A Not 100 percent, but I know they have a lot of
 22 these young interns working there.
 23 Q Okay. And have you recommended people for jobs as
 24 interns in the White House during the Clinton Administration?
 25 A Yes.

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1 Q And about how many people have you recommended, if
 2 you know?
 3 A Off the top of my head, just two.
 4 Q And who are they?
 5 A Monica Lewinsky and my grandson.
 6 Q And did your grandson also have a job as an intern
 7 in the White House during this Administration?
 8 A Yes.
 9 Q What is your grandson's name?
 10 A [REDACTED]
 11 Q Okay. And [REDACTED] is with [REDACTED]?
 12 A [REDACTED]
 13 Q [REDACTED]
 14 A Yes.
 15 Q All right. And when was he an intern in the White
 16 House?
 17 A Sometime in this period. I can't tell you exactly
 18 when.
 19 Q Was it during the first term of the Clinton
 20 Administration?
 21 A Yeah, it was the first term, because the second
 22 term -- yeah, I would say it was during the first term. Even
 23 now I'm not 100 percent sure.
 24 Q Okay. Tell the grand jury what you know about
 25 Monica's application to be an intern in the White House. How

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1 did you first find out that she was interested in this?
 2 A Either she asked me or her mother asked me.
 3 Q And what did they ask you?
 4 A If it's possible to get her a job as an intern.
 5 Q Do you know if they asked you in person or on the
 6 telephone?
 7 A I can't tell you that. I don't remember.
 8 Q Okay. Do you recall which one or if both of them
 9 spoke to you about it?
 10 A I can't tell you exactly which one or both or --
 11 Q Okay. And do you remember what your response was
 12 when they asked you?
 13 A My usual response is, "I'll try."
 14 Q Okay. And what did you do?
 15 A I went to the DNC to see if they could help her get
 16 a job.
 17 Q Who did you speak to there?
 18 A Jennifer Scully.
 19 Q Who is she?
 20 A She worked for the DNC at that time.
 21 Q Do you know what her job was?
 22 A She was just -- I don't know what their official
 23 title is, but account exec? No, I don't remember. They had
 24 an awful lot of these young kids working there, you know,
 25 and --

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1 Q How did you know her?
 2 A She was my contact there. How did I know her? I
 3 met her as a result of the -- oh, she was the young lady who
 4 told me that she was going to introduce me to Mrs. Clinton at
 5 the --
 6 Q All right.
 7 A That was the first time I met her.
 8 Q Okay. At the Women's Forum?
 9 A Right, Women's Leadership Forum.
 10 Q And is Jennifer Scully the person you spoke to when
 11 -- if you spoke to anybody, when your grandson got an
 12 internship at the White House?
 13 A Probably spoke to Jennifer Scully.
 14 Q Who got the internship first, Monica or your
 15 grandson?
 16 A I don't remember.
 17 Q Okay. Do you remember what you said to Jennifer
 18 about Monica when you spoke to her?
 19 A I probably just said, "Listen, I need to get a job
 20 for this kid. If you can help me out, I'd appreciate it."
 21 Q Did you speak to anybody else besides Jennifer
 22 Scully, either in the DNC or in the White House or anywhere
 23 else?
 24 A I may have. I don't remember.
 25 Q Okay. Do you know whether you spoke to anybody at

1 the White House about getting Monica an internship?
 2 A I may have. I don't remember. You know, I don't -
 3 - I mean, there's so many people there.
 4 Q And why would go through the DNC as opposed to jus.
 5 calling someone at the White House?
 6 A Because the power comes from the DNC. I mean, if
 7 you're a large contributor, you know -- and Jennifer Scully
 8 worked for the DNC.
 9 Q Okay. So how many calls did you make or how many
 10 conversations did you have about Monica with Jennifer Scully?
 11 A It's hard to remember that.
 12 Q Okay. Do you remember -- did you ultimately learn
 13 that Monica got an internship at the White House?
 14 A Yeah, sure.
 15 Q Do you remember how you learned?
 16 A I don't remember that either. Somebody must have
 17 called to tell me, you know. Jennifer Scully could have
 18 called me or her mother or she.
 19 Q Do you remember when, approximately, Monica got an
 20 internship at the White House?
 21 A I don't remember the dates at all.
 22 Q Do you remember the year? Does the summer of 19 --
 23 A I could try to work it out backwards, you know,
 24 or --
 25 Q Okay.

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1 A Let's see. He came back in, say, '94. I would say
 2 probably somewhere around '95, '95, '96.
 3 Q Does the summer of 1995 sound right to you, or
 4 sound more or less accurate?
 5 A Possibly, right. I just said '95.
 6 Q Did you meet with Monica at or about the time that
 7 she was applying for this internship? When you recommended
 8 her, did you talk to her about it in person, that you
 9 remember?
 10 A I don't remember.
 11 Q Did you ever look at a resume that she had?
 12 A The truth?
 13 Q Yes.
 14 A I mean, totally truth. I really don't remember
 15 that.
 16 Q Okay. Do you know anything about her --
 17 A She probably applied directly to them. I think
 18 that's the procedure. That is the procedure. Somebody just
 19 called me recently. I said, "Listen, I have nothing to do
 20 with that."
 21 Q Do you know anything, or did you know anything at
 22 that time about her educational background?
 23 A I just knew that she had graduated from college.
 24 Q Do you know which one, or did you know which one
 25 back then?

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<p>1 A At that time I didn't know, but I since have 2 learned from, you know, reading -- it was up in Oregon or 3 something. 4 Q Did you know what her degree was back then? 5 A No. I still don't know. 6 Q Did you know anything about her employment history 7 at that time? 8 A No. 9 Q So you were just making this recommendation based 10 on your relationship with her family? 11 A That's right. 12 Q All right. Do you have any knowledge as to what 13 effect your efforts to get her this internship had on the 14 ultimate decision to hire her as an intern? 15 A I imagine it was, you know, pretty -- it was an 16 important effect. I was, you know, giving money like -- you 17 know, I was giving them a lot of money and -- 18 Q All right. There came a time when Monica began to 19 work at the White House as an intern, correct? 20 A Right. 21 Q And did you have any contact with her during the 22 time she was working as an intern, either in person or on the 23 phone? 24 A Again, we probably all went out and had dinner once 25 in a while or --</p>	<p>1 Q Okay. 2 A Probably not. I don't know, but I don't remember. 3 Q Would you talk to her mother on a regular basis 4 during that period? 5 A Not her mother on a regular -- you know, like on a 6 social event or something like that. 7 Q Of the two of them, Marcia Lewis, Monica Lewinsky, 8 during this period of time when Monica was working at the 9 White House, would either of them call you on the phone from 10 time to time? 11 A I don't seem to remember that. I don't know. 12 Q Okay. 13 A Sure, I spoke to both of them on the phone, but 14 whether I originated the call or -- 15 Q All right. When Monica got the internship, did 16 anybody from -- either her or her family express any 17 gratitude to you for your help in getting her an internship? 18 A I don't remember specifically. They probably 19 called to say thanks. I don't know. 20 Q Okay. But you don't remember specifically? 21 A No. 22 Q Okay. During the time that Monica was working at 23 the White House as an intern, did the subject ever come up in 24 any discussions that you had with her or with her mother or 25 her aunt about the prospect of Monica getting a permanent job</p>
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<p>1 Q Okay. You knew that she lived at the Watergate, 2 right? 3 A Yes. 4 Q And you knew she lived with her mother? 5 A Yes. 6 Q Okay. Do you know if anybody else was living with 7 them at the time? 8 A That I don't know. 9 Q Okay. Do you have any recollection of ever 10 visiting Monica at the White House when she was an intern 11 there? 12 A Only specifically to visit her? 13 Q Well, while you there maybe doing other things, did 14 you ever stop by and say hello to her? 15 A No, I never -- I didn't know where her office is. 16 I bumped into her once, I remember, or twice in the corridor, 17 but -- 18 Q In the White House. 19 A In the White House. 20 Q When she was working there. 21 A Yeah. 22 Q Okay. Do you know whether you had any telephone 23 contact with her during the period she was an intern at the 24 White House? 25 A I absolutely don't remember.</p>	<p>1 at the White House? 2 A Yes. Her mother spoke to me about it, and also the 3 aunt. 4 Q Her mother and Aunt Debra? 5 A Right. 6 Q Debra Finerman. 7 A Right. 8 Q What do you remember about those conversations? 9 A I just remember them telling me that she needed a 10 permanent -- a salary-paying job. That the conditions were 11 very bad, and she couldn't give her any more money, her 12 father wasn't going to give her any money. 13 Q When you say, "She couldn't give her any money," 14 you mean her mother? 15 A Marcia, Marcia. 16 Q So when you say conditions were bad, you mean 17 financial circumstances? 18 A Financial, yeah. I was led to believe that, yeah. 19 Q So you were led to believe she needed a permanent 20 paying job -- 21 A Yes. 22 Q -- for purposes of supporting herself. 23 A Yeah. I remember once she told me that she has to 24 get a permanent job because her father didn't want to support 25 her anymore.</p>

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1 Q Had you ever met her father?
 2 A Never met her father. Saw him on TV the first time
 3 a few months ago.
 4 Q And you've never met him.
 5 A (Shaking head.)
 6 Q So when that subject was raised and you said her
 7 mother -- you remember her mother talking to you about the
 8 fact that Monica needed a permanent job at the White House,
 9 did Monica also talk to you about that?
 10 A I don't remember specifically, but I'm sure she
 11 did. She was really looking for a job.
 12 Q What did you say to her mother when her mother said
 13 to you Monica needs a permanent job?
 14 A I said, "I can't help you with that."
 15 Q Why did you say that?
 16 A I just -- I didn't even know how to go about
 17 getting her a permanent job.
 18 Q Well, you made efforts on her behalf to get her the
 19 internship, right?
 20 A Yeah.
 21 Q Okay. And you could have similarly picked up the
 22 phone and made a call to anybody --
 23 A I really don't remember doing that.
 24 Q Well, let me ask you something. Going back to your
 25 conversation with Marcia, you said you have a memory of

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1 telling her, "I can't do anything," right?
 2 A (Nodding.)
 3 Q Is there some reason why you said that?
 4 A When she was going from the -- when she was leaving
 5 the intern's job, right?
 6 Q Well, whenever the subject came up that Monica
 7 would like to get a permanent job at the White House, a
 8 permanent paying job, when that subject came up and you were
 9 asked for assistance by her mother in that regard, what do
 10 you remember about what you said, what your response was?
 11 A I probably said I would try.
 12 Q Well, a moment ago you said, "I told her I couldn't
 13 help her."
 14 A That's right. And then I told her I couldn't help.
 15 I don't know if I even really tried. I'm trying to remember
 16 who I actually called, if anybody.
 17 But I -- I think that after she left the intern's
 18 job, I think she did get a job, a paying job.
 19 Q But I'm asking you about --
 20 A Which I had nothing to do with, by the way.
 21 Q You had nothing to do with her getting a permanent
 22 job at the White House.
 23 A Right.
 24 Q Is that what you're saying?
 25 A Right.

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1 Q Okay. But what I'm asking you is about your
 2 conversations with her mother, or conversation with her
 3 mother when her mother asked you for help in getting Monica a
 4 permanent job at the White House. What was your response.
 5 MR. WISENBERG: It's page 9 of the chronos, relevant
 6 to some of --
 7 THE WITNESS: It's hard for me to remember, but --
 8 I don't remember already I had cooled off about them and --
 9 BY MS. WIRTH:
 10 Q Okay.
 11 A I remember her mother asking me to try to get her -
 12 - help get her a job. That I definitely remember.
 13 Q At the White House, while Monica was an intern.
 14 A I'm not sure if she was still an intern or she had
 15 already, you know, left the job as an intern. I can't
 16 pinpoint --
 17 Q But it was around that period of time.
 18 A Around that period, yeah.
 19 Q And you remember her mother asking you for help
 20 to --
 21 A Right, right.
 22 Q -- get her a permanent job at the White House.
 23 A Right.
 24 Q And do you have any memory if that was in person or
 25 on the phone?

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1 A I don't remember that.
 2 Q And do you remember what your reaction was? Was it
 3 positive or negative, do you remember?
 4 A It could have still been positive. Eventually it
 5 turned negative, but it wasn't the most important thing in my
 6 life, whatever the reason was.
 7 Q I understand. But do know whether you made any
 8 efforts on her behalf to get Monica a permanent job at the
 9 White House?
 10 A I may have made a call or two. I don't remember.
 11 Q You don't remember.
 12 A I don't remember.
 13 Q You said a moment ago that at some point you cooled
 14 off in terms of your feelings towards --
 15 A Yeah, I think later on.
 16 Q Who did you cool off towards?
 17 A The whole situation.
 18 Q Meaning the whole family?
 19 A (Nodding.)
 20 Q Why?
 21 A I had heard stories that, you know, Monica had
 22 become very aggressive in the White House, you know, and
 23 just felt uncomfortable with it.
 24 Q Okay. When you said you heard stories about Monica
 25 becoming aggressive in the White House, who had you heard

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1 that from?

2 A It may have been Debi Schiff or Ann McCoy, probably

3 more so Debi.

4 Q Were those things told you in person or over the

5 telephone?

6 A Could have been in person or the telephone, very

7 likely. I don't know. I don't remember anybody calling to

8 tell me, you know, "Walter, she's become very aggressive,"

9 or --

10 Q But the subject came up.

11 A The subject came up, yeah.

12 Q Do you know if it was both Debi Schiff and Ann

13 McCoy who told you those things?

14 A I can't tell you exactly.

15 Q But do you have a memory of --

16 A I do remember a rumor around that it was Sylvia

17 Lieberman, if you know her name --

18 Q Evelyn Lieberman?

19 A Evelyn Lieberman, excuse me, who had become very

20 unhappy with her. But she never told me that personally.

21 Q Evelyn never did.

22 A No.

23 Q Did you know Evelyn?

24 A I know her.

25 Q Have you known her from before her days at the

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1 White House?

2 A No.

3 Q Just since her association with the White House.

4 A Right.

5 Q Have you ever discussed Monica Lewinsky with Evelyn

6 Lieberman?

7 A Never remember discussing her with Monica Lewinsky.

8 BY MR. WISENBERG:

9 Q You've mentioned a couple of things. One, that

10 somebody told you, either Debi Schiff or Ann McCoy, that

11 Monica was very aggressive around the White House. And the

12 other thing is that somebody told you Evelyn Lieberman wasn't

13 happy with her.

14 What did they -- let's take the first thing first.

15 What did they tell you other than she's being aggressive?

16 Tell us all the things you can remember them telling you

17 about the problems with Monica.

18 A In fact, I don't know who told -- you know, who it

19 came from, but I remember one expression I remember, that she

20 was stalking the President. Who told me that I don't

21 remember.

22 Q Did that disturb you?

23 A I thought they were nuts. I mean, I couldn't

24 imagine this kid stalking the President.

25 Q You thought the people telling you that were nuts.

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1 A No, I thought that, you know, it was just -- it was

2 just unbelievable to me.

3 BY MS. WIRTH:

4 Q Was that told to you in the manner of a complaint

5 or a concern or just gossip?

6 A I don't know.

7 BY MR. WISENBERG:

8 Q Well, you would be a person -- I'm sorry, did I cut

9 you off?

10 A No, you didn't cut me off..

11 Q Would it be fair to say you would be a person that

12 the White House and people in the White House would not want

13 to go out of their way to alienate? Is that a fair

14 statement?

15 A Yeah, I would say they tried to be nice to me.

16 Q You're not only a friendly guy, as we can tell, but

17 you're giving a lot of money to the party.

18 A Right. I would say they were trying to please me.

19 They wouldn't want to alienate me.

20 Q So was this more along the lines of, "Mr. Kaye,

21 Walter, we've got a problem with someone who we know you've

22 kind of sponsored. We've kind of got a problem here."

23 A They didn't say -- I remember that. Nobody ever

24 said that to me at that time. I looked to remember who told

25 me that, but -- I just couldn't believe it. This young kid,

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1 in an unimportant job, how she could be stalking the

2 President.

3 Because I've been to the White House, you know.

4 It's a very secure area, you know, and --

5 Q How did you take stalking to mean? How did you --

6 I mean --

7 A Stalking, when you read about these nuts that stalk

8 somebody, you know, out to kill them or something, you know.

9 Q Okay.

10 BY MS. WIRTH:

11 Q Do you remember what your response was then you

12 were told that? Did you say anything to the person?

13 A I probably went, "Eh." I don't know. I don't

14 remember. I'm still in a state of shock about it. I mean,

15 I --

16 Q Of the list of possible people who could have told

17 you that, who would be on that list?

18 A Any one of the people who were at the White House

19 that I know.

20 Q That you mentioned? Are there any names at the top

21 of that list who are the most likely candidates of people who

22 told you that?

23 A (Shaking head.)

24 Q Did you ever have a conversation with Debi Schiff

25 about Monica Lewinsky?

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1 A I may have, I may have.
 2 Q What do you remember?
 3 A Just that I think Debi let me sort of -- told me
 4 that she was a very aggressive young lady. I don't know if
 5 that's the exact term, you know. You can't hold that to me.
 6 Q But that was the sense of the conversation.
 7 A Yeah.
 8 Q When Ms. Schiff told you, in essence, that Monica
 9 was very aggressive, was she more specific than that?
 10 A No.
 11 Q What did you take "aggressive" to mean, or terms to
 12 that effect?
 13 A Aggressive people. For example, I don't know if at
 14 that time I heard she was going all over the place looking
 15 for a job. She went to see everybody. Who told me that I
 16 don't know.
 17 Q Looking for a job in the White House?
 18 A In the White House, yeah.
 19 Q Was that after she had left and was working at the
 20 Pentagon or before that?
 21 A Before. Because by the time she went to the
 22 Pentagon, I never spoke to her, or very rarely. I hoped my
 23 memory was better, but I --
 24 Somebody did mention to me that -- I remember
 25 hearing the story that Evelyn Lieberman sent her home one

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1 day, that she was improperly attired. I remember that.
 2 Q Do you remember who you heard that from?
 3 A (Shaking head.)
 4 Q Did you ever discuss any of this with her mother,
 5 Monica's mother?
 6 A No.
 7 Q When you were asked by Monica's mother if you would
 8 assist Monica in getting a permanent job at the White House,
 9 had you heard some of these things about Monica being
 10 aggressive and going all over looking for a job and being
 11 improperly attired? Had you heard any of those things?
 12 A I don't think I had heard it at that time yet. I
 13 don't think so. Or it could be, because I really didn't do
 14 anything to get her a paying job at the White House.
 15 MR. WISENBERG: Can I interrupt?
 16 MS. WIRTH: Go ahead.
 17 BY MR. WISENBERG:
 18 Q But knowing that you were who you were, is it
 19 possible that -- let me preface this by saying the job that
 20 she got at the White House after her internship --
 21 A A paying job.
 22 Q -- or paying job was a relatively low-level one.
 23 A I don't even know. I assume --
 24 Q I'm prefacing my question by letting you know that
 25 And do you think it's possible that --

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1 A In other words, you're letting me know that it was
 2 a low-paying job.
 3 Q It was a low-level job.
 4 A Low-level job, excuse me.
 5 Q And I'm letting you know that as a preface to my
 6 next question. In other words, it wasn't a super-important
 7 job, or even an important job.
 8 A Right.
 9 Q Do you think it's possible that just even a slight
 10 interest by you, even maybe a letter or a phone call by you
 11 to somebody at the White House at that time, could have been
 12 enough, given who you were, to help land her a low-paying
 13 job, in the same sense that you had helped to get the intern
 14 job?
 15 A I don't think so.
 16 Q Okay.
 17 A I don't think I was ever that important.
 18 Q But your influence helped her get -- and I'm not
 19 indicating that there's anything wrong with this. Your
 20 influence helped her get the intern job.
 21 A I would say you're 100 percent right, no question
 22 about that.
 23 Q She never thanked you -- to your recollection, she
 24 never thanked you for helping her get her paying job at the
 25 White House.

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1 A No. I don't remember. That I remember, I had
 2 nothing to do with that. The next thing I heard a short time
 3 later that she was out of that job.
 4 BY MS. WIRTH:
 5 Q All right. Mr. Kaye, I show you two documents that
 6 I've marked as --
 7 MR. WISENBERG: Hold on a second. We have a
 8 question.
 9 THE FOREPERSON: There's a question.
 10 MS. WIRTH: Oh, I'm sorry. Go ahead.
 11 A JUROR: Sir, do you think that there was anyone
 12 else helping her to get a low-paying job?
 13 THE WITNESS: I don't know. She may have made some
 14 contacts. I wasn't aware of it.
 15 A JUROR: She never mentioned anything to you about
 16 it.
 17 THE WITNESS: No, not that I remember. The next
 18 thing I heard, that she had gotten a paying job. But I
 19 certainly never remember, you know, my calling anybody for
 20 her or -- who else could have helped her, I don't know. You
 21 know, she probably had a lot of friends there, I don't know.
 22 She probably made a lot of friends.
 23 (Grand Jury Exhibit Nos. WK-12 and WK-13
 24 were marked for identification.)

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BY MS. WIRTH:

Q Anyway, I'm going to show you two documents that we've marked Grand Jury Exhibits WK-12 and WK-13. The first one is a memorandum to you, to Walter Kaye, and it gives us that fax number, 212-338-2296.

A Yeah, she sent it by fax.

Q And from Ann McCoy, who you told us you know, correct?

A Sure, I know her.

Q And it says, "Re: Resume of Monica Lewinsky," correct?

A Yeah.

Q Okay. And then there's a two-line message on this memorandum that says, "Today I received the enclosed memo from Patsy Thomasson, Deputy Director of the Office of Presidential Personnel." Is that correct? Is that what it says?

A That's right, yeah.

Q And then the next line is, "I will let you know immediately if I have any further information from Patsy's office." Is that correct?

A Right.

Q Okay. And the WK-13 is a memo to Ann McCoy from Patsy Thomasson. And, by the way, this WK-12 is dated October 12, 1995; is that right?

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A Right.

Q And this second document, WK-13, is dated October 17, 1995. It's a memo from Patsy Thomasson to Ann McCoy; is that correct?

A Right.

Q And the date is correct that I read?

A Right.

Q Okay. And it's re: Resume of Monica Lewinsky, correct?

A Right.

Q And there's a cc to Maggie Williams, correct?

A (Nodding.)

Q Yes?

A Yes.

Q Okay. And then there's the following text: "Thank you for taking the time to forward the resume of Monica Lewinsky. The job situation is very tight with a lack of budgets throughout the government. We will keep her resume on file and forward to appropriate agencies if openings become available."

Did I read that right?

A Yes, you did.

Q Okay. So WK-12, let's take that first. That's the memo to you from Ann McCoy.

A Right.

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Q Do you remember receiving this?

A I really don't remember.

Q Do you remember receiving any written communications from Ann McCoy about Monica's job prospects at the White House?

A Off the top of my head, I don't remember any of this.

Q Okay. Do you know Patsy Thomasson?

A I have met Patsy Thomasson a few times. I don't know her well. Except when I think of it, I may have once mentioned to Patsy Thomasson about getting a job for Monica Lewinsky.

Q You did. What do you remember about that?

A Just that I mentioned it in a very casual way at a party, you know, one of these cocktail parties or something like that.

Q And this was during the time that Monica's mother had asked for your assistance?

A I would assume it was the same time. But I'm not 100 percent sure.

Q Okay. Do you have any recollection of any response that Ms. Thomasson had at that time?

A I don't remember her ever responding to me.

Q Okay. And you have no memory of either of these documents, WK-12 or 13.

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A In fact, as I look at these, I never remember seeing this. May have, may have.

But I know my secretary did a thorough search when we got the subpoena, and she went through everything, and she evidently didn't come across it.

Q Okay. This memo, WK-13, from Patsy to Ann McCoy, would you agree that the gist of what Ms. Thomasson has written here is that, basically, it's very unlikely that Monica Lewinsky will get a job in the White House?

A Absolutely right.

Q Okay.

A What's the date of the letter?

Q October 17, 1995; is that correct? That's what's written here?

A Yeah, right, that's correct, yeah.

Q And this comes first, and then the October 23, 1995, memo to you attaching a memo from Patsy Thomasson.

A I absolutely don't remember either one of these memos.

Q Okay. Do you ever remember, you know, hearing from anyone at the White House that things were really tight, and it's unlikely Monica will get a job here?

A I had heard that, yeah.

Q Do you remember who you heard that from?

A I could have heard it from Ann McCoy.

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1 Q Do you have any idea what changed Monica's
2 prospects at the White House so that she did get a job, a
3 permanent job there?

4 A That I don't know.

5 Q Do you have any idea whether it was anything that
6 you did that changed the prospects?

7 A Absolutely not.

8 Q It's your opinion that nothing you did changed her
9 prospects.

10 A Nothing.

11 Q Okay. Because you have no memory of taking any
12 steps to help her.

13 A I didn't do a thing.

14 Q Okay.

15 BY MR. WISENBERG:

16 Q Do you remember her, Monica, bothering you -- or
17 maybe "bothering" is to rugged a word -- calling you at the
18 time to try to get your help?

19 A I think she did, but, again, I'm not 100 percent
20 sure.

21 Q And do you remember what she said?

22 A This is when she started to look for a paying job.

23 Q Right.

24 A I'm surmising now, but I suppose at that time she
25 was telling me she needed a job.

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1 Q Do you recall whether or not she or anyone on her
2 behalf expressed an interest in going to the White House
3 Social Office?

4 A I don't remember that. That I don't remember at
5 all. In fact, I would say I'm pretty sure she never
6 mentioned that to me.

7 Q Okay.

8 BY MS. WIRTH:

9 Q We'll mark as Grand Jury Exhibit --

10 A You know it bothers me I never saw that memorandum.
11 I never remember seeing that memorandum.

12 Q By that, you mean --

13 A Those two memos.

14 Q -- WK-12 and WK-13. You're certain of that.

15 A Pretty certain. I won't say 100 percent, as,
16 again, I tell you, you know --

17 Q Are these the kinds of records that you would have
18 kept if you had received them?

19 A Maybe yes, maybe no.

20 BY MR. WISENBERG:

21 Q They're fairly perfunctory, are they not, in
22 nature?

23 A Yeah. Now that I look at them, it's as if they
24 were just giving her the brush-off, you know. It wasn't
25 somebody that was on top of their priority list.

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1 Q And she wasn't on the top of yours at that point
2 either, was she?

3 A I'm trying to remember. That's a good question, if
4 by that time I had become more and more disillusioned with
5 her. See, I was embarrassed when I heard about Sylvia
6 Lieberman, is that her name?

7 Q Evelyn.

8 A Evelyn-Lieberman. Because, you know, I thought it
9 would reflect on me. You know, the kid doesn't even know how
10 to come in and dress, you know, and -- I think somebody told
11 me she was wearing short skirts, you know, and --

12 I suppose by that time I was, you know, losing
13 interest. Is that the right term? I don't know.

14 Q Even if you weren't disillusioned yet, based on
15 these things that you heard, if I'm understanding you
16 correctly, you do not recall making any kind of a major
17 effort to help get her a paying job at the White House.

18 A I didn't know who to talk to, and I just didn't do
19 it, I didn't. I'm trying to remember why I didn't want to do
20 it. I don't remember why.

21 Q Could it have been related to the Three Tenors
22 book?

23 A Yeah, I was very disillusioned when the mother came
24 out with that book.

25 Q And why is that?

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1 A Because I just don't think that's what you write
2 about, Domingo having an affair or something like that.

3 I think I told the grand jury in Little Rock that
4 I'm somewhat involved with the opera, and for many, many
5 years -- I just didn't think that's the proper thing to do.

6 BY MS. WIRTH:

7 Q Did you feel that any information you had imparted
8 to either Marcia or her sister was in that book?

9 A About the -- no.

10 Q No?

11 A You know, now that you refresh my memory here, when
12 I spoke to her -- when I saw her once at dinner or something,
13 you know, she was telling me the book is such a phenomenal
14 success, you know, and --

15 BY MR. WISENBERG:

16 Q She was telling you that?

17 A Yeah. When did she write the book, do you
18 remember? Am I allowed to ask you that or I'm not allowed to
19 ask you?

20 Q Well, it really doesn't matter whether you are or
21 not because I don't know the answer offhand.

22 A Okay.

23 Q But if I knew it offhand, I'd let you know.

24 A I know I have a copy of the book.

25 BY MS. WIRTH:

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1 Q Do you have any memory whether around this time
2 that Monica was asking for a permanent job whether that book
3 had come out at that point, do you know?

4 A I can't really tell you. I just don't remember
5 that time.

6 Q Okay.

7 A But I seem to remember more about it when they let
8 her go, and she was looking for a job.

9 Q When "they," the White House let her go?

10 A Yeah. Or I didn't know if they let her go. What I
11 had heard was, they discontinued -- can you people hear me? -
12 - that they had discontinued the office that she was in. I
13 didn't know -- it wasn't my business, you know, and --

14 BY MR. WISENBERG:

15 Q Who do you think told you that?

16 A I just thought the kid was very aggressive, you
17 know. She -- I just felt uncomfortable with them -- her.

18 Say your question again?

19 Q You said you had heard that they discontinued the
20 office. Do you recall who told you that?

21 A I think she told me that.

22 Q Monica did?

23 A I think, or her mother. If I recall, she had
24 something to do with the Legislative Office or something.

25 BY MS. WIRTH:

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1 Q During the time she was at -- it was the Office of
2 Legislative Affairs? Does that sound familiar?

3 A That sounds right, absolutely right.

4 Q And I think you said earlier that your memory was
5 that she wasn't there very long.

6 A I think that her stay there was a very short
7 period.

8 Q Did you ever see her there? Did you ever visit her
9 there?

10 A No.

11 Q No?

12 A Never.

13 Q During the time that she was working at the Office
14 of Legislative Affairs, did you hear any information or
15 feedback about how she was doing?

16 A No. Not that I remember, again, you know. One of
17 the unimportant things was Monica Lewinsky telling me about
18 her job.

19 Q Did you continue to hear things like she's
20 aggressive, she's a stalker, during the period of time that
21 she was working at the Office of Legislative Affairs?

22 A I can't even tell you exactly when they told me
23 that, but --

24 BY MR. WISENBERG:

25 Q You're not even sure when you first found that out,

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1 in other words.

2 A No, I can't pinpoint the date.

3 BY MS. WIRTH:

4 Q Do you have a sense that she was at the White House
5 working either as an intern or as a permanent employee when
6 you heard that?

7 A Well, she was either an intern or a permanent
8 employee.

9 Q When you heard that.

10 A Yeah.

11 Q Did she keep in contact with you during the time
12 she was working at the Office of Legislative Affairs? Did
13 she speak to you from time to time?

14 A Yeah, maybe once in a while. I don't remember if
15 she spoke to me -- I would go down there very often. I would
16 do a lot of entertaining in Washington, and at that time I
17 was still intrigued by it, and they would join us sometimes.

18 Q How did you hear that she had lost her job at the
19 White House?

20 A I'm not -- I'm assuming now, okay, because I can't
21 tell you that. That either came from her mother or her aunt.

22 I can't imagine Ann McCoy calling me to tell me that Monica
23 Lewinsky lost her job.

24 Q Okay. Do you know how soon after Monica lost her
25 job they called you?

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1 A I don't remember.

2 Q Did they in any way request your assistance in
3 trying to undo the decision to fire her or transfer her?

4 A I'm trying to remember if they asked me if I could
5 be of help to her to get a job, you know. But if I recall,
6 again, you know, from, you know, reconstructing this thing,
7 it was a short time after that that she went to work in the
8 Pentagon.

9 Q At the time she was either fired or transferred
10 from the White House, did you ever receive any calls from her
11 or from her mother or her aunt asking you intercede on her
12 behalf so that she wouldn't be fired or transferred?

13 A I don't remember that. I don't remember that.

14 BY MR. WISENBERG:

15 Q Let me -- some of our investigators have some
16 information to the effect that during this period when she
17 was transferred out, basically --

18 A After she left the White House.

19 Q Well, right around the time where she's told,
20 "You're going to be let go," from the White House, that she
21 is making desperate efforts to stay at the White House to
22 counteract that decision, even so much as to agree to work
23 there voluntarily.

24 And my question to you is, do you recall her or
25 anyone on her behalf during this time period calling you and

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1 enlisting your aid in that effort?
 2 A They may have, but it's -- I doubt it. I don't
 3 know. I know one thing, I didn't do anything, I mean, to,
 4 you know, to help her, you know --
 5 THE FOREPERSON: May I ask a question?
 6 MR. WISENBERG: Sure.
 7 THE FOREPERSON: I know this may require a little
 8 guesswork on your part, but did you ever get the impression
 9 that she may have been dropping your name quite a bit around
 10 the White House?
 11 THE WITNESS: I didn't realize it then, but now,
 12 you know, the stuff about Uncle Walter, you know, and bull
 13 like that, I realize now that she may have been doing that.
 14 MR. WISENBERG: Did you say "bull"?
 15 THE WITNESS: Bull, I said b-u-l-l, because I
 16 became incensed when I saw that. My grandkids --
 17 THE FOREPERSON: Can I ask you --
 18 THE WITNESS: Sure.
 19 THE FOREPERSON: -- if you ever use the terminology
 20 "bubula"?
 21 THE WITNESS: I sure do.
 22 THE FOREPERSON: Thank you.
 23 THE WITNESS: I use it very often.
 24 THE FOREPERSON: Okay.
 25 MR. WISENBERG: How do you pronounce it?

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1 THE WITNESS: Do you know what the term means?
 2 Bubula, it's a Jewish term -- in case you people don't know,
 3 I'm Jewish -- and it's a term -- I use it as an expression of
 4 endearment. I use it very often. I could have called her
 5 bubula at some time.
 6 MR. WISENBERG: But you said you -- I'm sorry.
 7 THE FOREPERSON: It's in the chron, page 14.
 8 MR. WISENBERG: Did I cut you off?
 9 THE FOREPERSON: No, no. Because maybe when you're
 10 hanging up on the phone with somebody, "Call me bubula." Do
 11 you ever --
 12 THE WITNESS: Say that again?
 13 THE FOREPERSON: "Call me bubula." Do you ever --
 14 THE WITNESS: Say to me? Nobody ever says it to
 15 me.
 16 THE FOREPERSON: No, no, no. But when you're
 17 winding up a telephone conversation.
 18 THE WITNESS: So I'll say, "Goodbye, bubula." I'll
 19 do that, absolutely right.
 20 MR. WISENBERG: "Give me a call some time, bubula."
 21 THE WITNESS: Bubula, absolutely right. I taught a
 22 lot of people Yiddish at the White House, a few words anyhow,
 23 and the Army. It's hard to believe, but -- it's a term I
 24 use. How do I spell it? I don't know.
 25 MR. WISENBERG: Do you spell it with or without the

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1 "h"? I'm just kidding.
 2 (Laughter.)
 3 THE WITNESS: I never knew there was an "h" or
 4 bubula.
 5 MR. WISENBERG: My lips are sealed.
 6 THE WITNESS: You try to be nice to somebody.
 7 BY MR. WISENBERG:
 8 Q You said that you became incensed --
 9 A I was getting angry at her because, you know, here
 10 I knew that she -- you know, that she was -- the intern's job
 11 was over, and she was looking desperately to get a job.
 12 BY MS. WIRTH:
 13 Q When you say looking desperately to get a job, do
 14 you mean within the White House?
 15 A Yeah.
 16 Q Yes?
 17 A In the White House, yeah, so --
 18 BY MR. WISENBERG:
 19 Q Well, I meant -- what I was referring to was -- I
 20 think just a couple minutes ago you said, if I understood
 21 you, you got incensed when you determined at some point in
 22 time that she was maybe dropping your name, and you
 23 referenced with Uncle Walter business.
 24 And I guess I'll ask you, number one, when did you
 25 hear that she might have referred to you around the White

Page .

1 House as Uncle Walter?
 2 A The only time I knew about it was when I read about
 3 it in the papers.
 4 Q Okay.
 5 A Nobody ever told me that at the White House.
 6 Q And why did that incense you?
 7 A It just bothers me, because she's trying to
 8 intimate that she was closer to me than she really was. The
 9 only people who call me Uncle Walter are my nieces and
 10 nephews, you know, and it was just -- I just felt it wasn't
 11 proper.
 12 Q As I understand what you're saying, she wasn't
 13 particularly close to you at all. Is that a fair statement?
 14 A I wouldn't say she was real close to me. And what
 15 do you mean "close," you know. I wouldn't say she was one of
 16 my close, intimate friends. A young kid.
 17 Q I take it you would have been quite taken aback if
 18 she had called you Uncle Walter to your face.
 19 A Absolutely. I probably would have told her not to
 20 do it. I don't know why that bothers me so. Not about her,
 21 but anybody about that.
 22 BY MS. WIRTH:
 23 Q Did you ever feel that either Monica or her moth-
 24 imposed on your time too much, either pestered you too much
 25 or --

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1 A Oh, I felt as -- you know, when she was looking for
2 a job, they were becoming a damn pain in the neck.
3 Q Too many phone calls?
4 A Phone calls or messages or -- Debra Finerman would
5 call me once in a while, "I'm sure you could do something,"
6 you know. I said, "I can do it."
7 Q If I told you that our records showed, for example,
8 that on September 6, 1995, which I'll represent to you was
9 during the period of time that Monica was working as an
10 intern at the White House, September 6, 1995, that there were
11 a total of ten calls made on that day alone to your office
12 phone number, the last of which was at midnight, do you have
13 any recollection of anything like that happening?
14 A You mean from Monica's phone in the White House?
15 Q No, these are actually calls from a phone in
16 Monica's apartment.
17 A Oh, in the apartment.
18 Q So I can't say, you know, whether these were calls
19 made by her or by her mother.
20 A Her mother.
21 Q But we're talking on September 6th of '95, a total
22 of ten calls made to your office phone from the apartment
23 shared by Monica and her mother at the Watergate.
24 A But I wasn't in the office, right?
25 Q I don't know.

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1 MR. WISENBERG: We obviously don't know whether or
2 not anybody actually connected or just left messages or
3 things like this.
4 THE WITNESS: It's highly unlikely I was in the
5 office until midnight.
6 BY MS. WIRTH:
7 Q Do you remember days like that, though, when you
8 got lots of phone calls?
9 A This is interesting. That your records show that
10 from their apartment -- one after another, you mean, or --
11 Q These phone calls begin at 8:36 in the morning
12 and --
13 A 8:36 a.m.?
14 Q Yes, and end at midnight.
15 A I certainly don't remember that.
16 Q On April 9th of 1996, which I'll represent to you
17 is Monica's last day working at the Office of Legislative
18 Affairs at the White House, if I told you that our records
19 show that on that day there were three phone calls made to
20 your office --
21 A From her office?
22 Q -- from -- again, from the apartment shared by
23 Monica and her mother. Do you have any recollection of those
24 phone calls, of receiving phone calls on her last day?
25 A I remember her calling me looking for a job, you

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1 know, anywhere. I also think she had told me already that
2 she had a job at the Pentagon. I said, "Why don't you go to
3 the Pentagon?" I remember that. So she said, "Eh, it's a
4 long subway ride, a train ride, you know," and --
5 Q Did she ever say to you, "What I really want to do
6 is stay in the White House. I don't want to leave"?
7 A I remember her telling me that.
8 Q Did she ask you to help her try to stay there?
9 A She probably did. Probably that's why she called
10 me. But, again, I just can't remember that specifically.
11 Q Did you ever do anything to assist her that you
12 recall to stay there?
13 A Absolutely not, that I remember.
14 Q Okay.
15 MR. WISENBERG: Can I --
16 MS. WIRTH: Oh, yes. Go ahead.
17 BY MR. WISENBERG:
18 Q As an example, there is a call from the apartment
19 to you, or to your number, and it indicates the call was --
20 A Is this the office or the house?
21 MS. WIRTH: The office.
22 BY MR. WISENBERG:
23 Q The [REDACTED], which you told us was the old
24 switchboard --
25 A Yeah, that was the old switchboard, yeah.

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1 Q -- 2:18 p.m., duration, 19 minutes. And not only
2 was this her last day at the White House, but this would have
3 been shortly after a meeting she had at the White House with
4 Patsy Thomasson about where she was going to be. And I'll
5 just tell you that at that time they were already planning to
6 send her to the Pentagon.
7 So your memory that you -- this is consistent with
8 what you just told us, that you already -- you think you
9 heard that she was already going to the Pentagon.
10 A Yeah, that she was going to the Pentagon, yeah.
11 Q And if I understand -- I don't want to put words in
12 your mouth --
13 A That's okay.
14 Q But if I understand what you've just said, you do
15 remember Monica or somebody on Monica's behalf asking you
16 if -- telling you that she wanted to stay in the White House.
17 A Right.
18 Q But you don't have a very detailed memory of that?
19 A But I also remember telling her, "What's wrong with
20 the Pentagon," you know.
21 Q Right.
22 A At that time I was so involved with the Army, you
23 know. I think they're great.
24 BY MS. WIRTH:
25 Q And this was Monica telling you, "It's a long

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<p>1 subway ride. I don't want to do that?"</p> <p>2 A It was either Monica, again, or her mother.</p> <p>3 BY MR. WISENBERG:</p> <p>4 Q You're not sure whether it was Monica or her</p> <p>5 mother.</p> <p>6 A (Nodding.)</p> <p>7 Q Is that a -- I couldn't hear you.</p> <p>8 A Oh, it was either Monica or her mother.</p> <p>9 Q Okay.</p> <p>10 BY MS. WIRTH:</p> <p>11 Q As I said a moment ago, our records show three</p> <p>12 calls from their apartment to your office on April 9th of</p> <p>13 1996. Our records also show that on April 10th, the next</p> <p>14 day, 1996, there is a ten-minute call, again, from the</p> <p>15 apartment to your office, followed by a call on April 12th</p> <p>16 and a call April 15th.</p> <p>17 A She was pretty desperate.</p> <p>18 Q Do you have any memory of Monica during this period</p> <p>19 of time speaking to you on the phone and seeming either</p> <p>20 upset, or did she cry? Do you remember any reaction that she</p> <p>21 had to leaving the White House?</p> <p>22 A As I think back now, she probably was very</p> <p>23 emotional. But I know one thing, I didn't do anything. I</p> <p>24 mean, I didn't, you know --</p> <p>25 BY MR. WISENBERG:</p>	<p>1 A Yes.</p> <p>2 Q What did you hear?</p> <p>3 A I heard a couple of women call me to say, "Wal</p> <p>4 you know what's going on? Monica Lewinsky is having an</p> <p>5 affair with the President." I said, "Oh, you're nuts," you</p> <p>6 know, or something like that.</p> <p>7 Q Who were these women?</p> <p>8 A I'll give you their names. I happen to remember</p> <p>9 them. And I'll tell you who else. The names were -- oh,</p> <p>10 God, I can't believe it. She's now treasurer of the -- I'll</p> <p>11 think of it.</p> <p>12 One was Ronnie Ginott, G-i-n-o-t-t, comes from New</p> <p>13 York, and they were active in the Women's Leadership Forum.</p> <p>14 And what's the other lady? Pensky, Carol Pensky.</p> <p>15 Q And were these things told to you when Monica was</p> <p>16 still working at the White House or after?</p> <p>17 A God, again, I don't remember.</p> <p>18 Q Do you have any memory of when these conversations</p> <p>19 took place?</p> <p>20 A No.</p> <p>21 BY MR. WISENBERG:</p> <p>22 Q Did you say you'll tell us somebody else?</p> <p>23 A Yeah. Her aunt told me that her mother had told</p> <p>24 her that she was getting calls from the President. I</p> <p>25 absolutely though it was off the -- you know.</p>
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<p>1 Q Did she tell you why she was -- well, I think</p> <p>2 you've already said --</p> <p>3 A When she was leaving.</p> <p>4 Q Yes. I think you've already said that someone told</p> <p>5 you, you think Monica, that the position was being</p> <p>6 eliminated.</p> <p>7 A She told me -- no, the whole office.</p> <p>8 Q The whole office.</p> <p>9 A They shut down the office.</p> <p>10 Q Okay. Did she give you any other reason at the</p> <p>11 time for why she was having to move?</p> <p>12 A I don't remember.</p> <p>13 Q Okay.</p> <p>14 A But I was shocked they were shutting down an</p> <p>15 office. But I didn't even inquire. I mean, it was, you</p> <p>16 know --</p> <p>17 BY MS. WIRTH:</p> <p>18 Q During any of this time -- you told us earlier that</p> <p>19 you heard things like Monica is aggressive, she doesn't dress</p> <p>20 appropriately. You told us that you'd been told she was</p> <p>21 stalking the President.</p> <p>22 Did you ever hear anything about any relationship</p> <p>23 between her and the President?</p> <p>24 A From anybody.</p> <p>25 Q From anybody.</p>	<p>1 Q In other words, Debra Finerman told you that Marcia</p> <p>2 Lewis had told Debra --</p> <p>3 A Right.</p> <p>4 Q -- that Monica was getting phone calls from the</p> <p>5 President?</p> <p>6 A Right.</p> <p>7 Q And what was your reaction when you heard that?</p> <p>8 A My reaction? I went into a state of -- I just</p> <p>9 couldn't believe it. I just couldn't believe it.</p> <p>10 BY MS. WIRTH:</p> <p>11 Q Do you remember how that subject came up with you</p> <p>12 and Debra?</p> <p>13 A No.</p> <p>14 Q Do you remember whether it was in the context of</p> <p>15 Debra asking you whether Monica could attend a fundraiser</p> <p>16 that you were sponsoring at the Waldorf?</p> <p>17 A That I was sponsoring at the Waldorf?</p> <p>18 Q Yes. Have you ever sponsored a fundraiser at the</p> <p>19 Waldorf? Have you ever bought a table at the fundraiser?</p> <p>20 A I've bought tables, I've bought plenty of tables.</p> <p>21 That was almost like a regular routine.</p> <p>22 Q Did Debra Finerman ever ask you whether Moni</p> <p>23 could sit at your table?</p> <p>24 A Yes.</p> <p>25 Q Do you remember when that was?</p>

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1 A I don't remember if she asked me if she could sit
2 at the table or we could get her in to the function.
3 Q Do you remember when the function was?
4 A It was either at the Radio City Music Hall or at
5 the -- one of the hotels.
6 Q Do you remember a function at the Waldorf?
7 A That Monica was there?
8 Q No, well --
9 A I remember Monica calling me once also -- and I
10 don't remember exactly when -- about getting in to see the
11 President at a function. I said, "Listen, buy a table. Buy
12 a table like anybody else."
13 Q In New York.
14 A In New York, yeah.
15 Q Do you remember whether it was in the context of
16 Debra Finerman asking you whether Monica could either attend
17 a function or sit at your table at a function in New York
18 that this conversation took place where Debra advised you
19 that the President had been calling Monica?
20 A At that time?
21 Q Yes. Do you know if that's when it came up.
22 A I don't remember.
23 Q Okay. Do you remember whether Debra Finerman told
24 you that the President was calling Monica at night?
25 A She told me that.

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1 MR. WISENBERG: Can I interrupt again?
2 MS. WIRTH: Yes.
3 BY MR. WISENBERG:
4 Q Did she just tell you out of the blue, "Marcia says
5 the President's calling Monica"? Or do you remember if it
6 was in reaction to something you said to her?
7 A I don't remember.
8 Q What I'm wondering is -- for instance, you've said
9 that at some point you heard from people such as Debi
10 Schiff -- or I think you said it would have been one of these
11 two, you think, Debi Schiff or Ann McCoy that Monica's
12 being -- you know, being or was aggressive around the White
13 House, the stalker, you've told us about the stalker, Evelyn
14 Lieberman and the dress incident.
15 Is it possible that you relayed that at some point
16 to Debra Finerman --
17 A I could have.
18 Q -- and that in reaction to that -- in other words,
19 you're kind of --
20 A Yeah, maybe you're right.
21 Q She asks you for a favor about Monica. You say,
22 "Monica's too aggressive," or something like that.
23 A You're refreshing my memory. She got damned
24 angry --
25 Q Okay. Tell us about that.

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1 A -- and I recall her -- I remember it now, you see.
2 That I had said that her niece was very aggressive, I had
3 heard she was very aggressive. She became very upset at
4 that.
5 Q Okay. And is that when she relayed --
6 A That I can't tell you. I don't remember that.
7 Q Okay.
8 A Possible. I don't remember. But I do remember she
9 got very upset about that, that I would call her niece
10 aggressive.
11 BY MS. WIRTH:
12 Q So when you said earlier that these two people,
13 Carol Pensky and Ronnie Ginott, I guess her name is --
14 A Yeah.
15 Q -- that they, in essence, told you that Monica was
16 having an affair with the President, that there was a third
17 person, and that was Debra Finerman, did you then infer from
18 the fact that these calls were being made by the President,
19 or at least that Debra Finerman said they were being made,
20 that something was going on?
21 A I was so shocked, I'll tell you, I --
22 Q Did Debra Finerman tell you anything else other
23 than the fact that the President was calling Monica?
24 A Not that I remember.
25 Q But she did tell you those phone calls were made at

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1 night?
2 A Yeah.
3 Q Did she tell you the middle of the night?
4 A She may have said the middle of the night. I don't
5 recall exactly. But I do remember for some reason it was at
6 night.
7 Q Okay.
8 BY MR. WISENBERG:
9 Q Do you remember if you -- now, you've told us two
10 different people -- and, of course, Debra Finerman is the
11 aunt -- but you've also got two DNC types, I take it, who
12 have told you --
13 A Yeah, these two other women.
14 Q -- who have told you there's an affair going on.
15 Do you repeat this to anybody?
16 A You mean, did I tell anybody about this?
17 Q Right, this information that you had learned,
18 either that there was a rumor of an affair or that the
19 President was making nighttime phone calls to Monica?
20 A I really don't remember. I doubt it. I don't
21 know. Possible.
22 Q I mean, it strikes me there are different ways in
23 which a person could tell. One, it's gossip. I'm repeating
24 some gossip.
25 A Yeah, at first, you know, I said to myself it could

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1 be gossip, you know. Even this thing with Debra Finerman
 2 could be gossip, you know.
 3 Q But I'm talking in terms of repeating that kind of
 4 information. You could either be repeating it -- I'm not
 5 saying that you did, but I'm positing two different things.
 6 One is, you could pass it along. It's an
 7 interesting piece of information.
 8 A Sure is.
 9 Q The second would be to warn somebody. As an
 10 example, to warn Monica, "These rumors are going around. You
 11 better do something about it."
 12 A I'd never do that.
 13 Q I'm just trying to jog your memory --
 14 A I understand.
 15 Q -- and I'm not saying you have a memory.
 16 A I don't remember that.
 17 Q Do you remember --
 18 A I never remember calling anybody, either Monica
 19 or --
 20 Q Okay. You don't remember telling anyone about
 21 these rumors you heard.
 22 A I'm just trying to remember who I could have told.
 23 I don't remember who I could have told. I know I wasn't
 24 going to talk about it at home, you know.

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1 BY MS. WIRTH:
 2 Q All right. After Monica went to work at the
 3 Pentagon, do you have any memory of speaking to her during
 4 that period of time that she --
 5 A I think I spoke to her a couple of times.
 6 Q Did she tell you how she was doing?
 7 A She told me she -- I'm trying to remember. In
 8 fact, I even met her at a couple of Pentagon functions. I
 9 was amazed the kid got a big job there. I don't know if you
 10 call that a big job, but next thing I heard, she was
 11 traveling with the Secretary of the Army, you know. I travel
 12 with the Secretary of the Army, I pay.
 13 But I was surprised because a young kid. I imagine
 14 she must have been about -- at that time 22, 23.
 15 Q And it seemed like a pretty good job to you that
 16 she had?
 17 A I thought it was a very exciting job. And then she
 18 worked directly for this guy -- what's his name?
 19 MR. WISENBERG: Bacon?
 20 THE WITNESS: Ken Bacon, right.
 21 BY MS. WIRTH:
 22 Q Do you know Mr. Bacon?
 23 A Do I know Mr. Bacon?
 24 Q Yes. Do you know Mr. Bacon?
 25 A I met him once, with her.

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1 Q Okay.
 2 MS. WIRTH: Go ahead.
 3 A JUROR: Did you conjecture as to how this car
 4 about?
 5 THE WITNESS: You mean the job at the Pentagon?
 6 A JUROR: Yes.
 7 THE WITNESS: I was surprised she got it, because I
 8 know I never made any calls.
 9 A JUROR: But did you have any ideas about what
 10 could have happened?
 11 THE WITNESS: I just thought somebody got her the
 12 job, you know.
 13 A JUROR: Do you know who that might be?
 14 THE WITNESS: No.
 15 BY MR. WISENBERG:
 16 Q Did you put together the rumors you heard about the
 17 affair and the fact that she got a nice job at the Pentagon?
 18 A I may have, but it doesn't stick in my mind,
 19 doesn't -- but I was surprised that she got a job like that,
 20 because Ken Bacon is the -- he's the number one spokesman,
 21 isn't he?
 22 And your question to me was, did I put two-and-two
 23 together --
 24 A JUROR: Yes.
 25 THE WITNESS: -- and say that maybe somebody at the

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1 White House got her the job?
 2 A JUROR: Yes.
 3 THE WITNESS: I may have thought about it, but I
 4 really don't remember.
 5 I know one thing. I had made up my mind that I was
 6 doing nothing.
 7 BY MR. WISENBERG:
 8 Q And why was that?
 9 A I don't know. I just felt uncomfortable about the
 10 whole thing, you know. It was just --
 11 But I also do remember she wanted to remain at the
 12 White House.
 13 BY MS. WIRTH:
 14 Q So during these conversations that she had with you
 15 when she was working at the Pentagon, she raised with you
 16 that she wanted to go back to work at the White House?
 17 A Yeah, she told me that. When exactly, I don't
 18 remember.
 19 Q Did she ever ask you if you would help her get back
 20 in?
 21 A She probably did, but I don't remember exactly.
 22 BY MR. WISENBERG:
 23 Q But you had determined in your mind that you
 24 weren't going to do that?
 25 A That's right.

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1 Q You said "because of the whole thing."
 2 A I was upset about the book, I was -- it just made
 3 me feel uncomfortable, the whole situation.
 4 Q Were you upset about the rumors you were hearing?
 5 A I was in a state of shock.
 6 BY MS. WIRTH:
 7 Q Did she ask you on more than one occasion to help
 8 her get back into the White House?
 9 A I don't remember specifically, but I would assume
 10 she did. But I was talking to her less and less and seeing
 11 her less and less. What was that, '95, is that what you're
 12 saying?
 13 BY MR. WISENBERG:
 14 Q She's actually -- she goes over to the Pentagon in
 15 April of '96.
 16 A April of '96?
 17 Q Yes.
 18 BY MS. WIRTH:
 19 Q Did Monica ever discuss the President with you?
 20 Did she ever --
 21 A Never.
 22 Q Did she ever tell you --
 23 A She just said he's a great guy, you know, and --
 24 MR. WISENBERG: By the way, any time you need to
 25 take a break, not just to talk to your attorney, but if you

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1 just need to take a break --
 2 THE WITNESS: No. If you can handle this, I can
 3 handle it. I'm no youngster, but I -- except I can't hear, I
 4 can't see. Other than that, I'm all right.
 5 BY MS. WIRTH:
 6 Q If you would take a look at Grand Jury WK-9, that
 7 check that you talked about earlier for \$10,000.
 8 A Yeah.
 9 Q Correct?
 10 A Right.
 11 Q It's dated November 25, 1996, and it's made out to
 12 Marcia Lewis, correct?
 13 A Right.
 14 Q And it's drawn on your account.
 15 A Right.
 16 Q What is the Walter Kaye Special Account?
 17 A That's the name of the account I've been using for
 18 years.
 19 Q Okay.
 20 A And this bank that's the only account I have.
 21 Q Okay. Now, you said that this was a gift, correct?
 22 A Yes, it was a gift.
 23 Q Okay. And it's a gift that you made in November of
 24 '96, correct?
 25 A Yeah.

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1 Q Now, you told the grand jury just a little bit ago
 2 that you were at this time not having good feelings about
 3 this whole family.
 4 A Yeah, but I also felt sorry for them, and I knew
 5 the aunt, you know, and she was very close to her sister. So
 6 what the heck, you know. I don't know what to say, you know,
 7 but I'm rather comfortable, and I give away lots of money.
 8 Q Was there any specific reason that you gave this
 9 money?
 10 A Not that I remember.
 11 Q Did anyone tell you, "We need money for 'x'" or --
 12 A [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 Q This is Marcia Lewis?
 16 A Yeah.
 17 Q This was not a loan, it was a gift.
 18 A It was a gift.
 19 Q Have you made similar gifts to her?
 20 A I think this is the only gift I've ever given to
 21 her. Again, I said "I think." I have to double-check. But
 22 that was the only check -- that was the only thing that was
 23 find, you know, pertaining to Monica Lewinsky.
 24 Q Do you know if this money was intended for Monica
 25 in any way or was it for her mother?

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1 A It was intended strictly for her mother.
 2 You know, I'd love to -- could I get a glass of
 3 water or something?
 4 Q Oh, sure, okay.
 5 A Is it all right if I go out and --
 6 MR. WISENBERG: Sure.
 7 MS. WIRTH: You want to take a break?
 8 THE FOREPERSON: Yes.
 9 MS. WIRTH: Fifteen minutes.
 10 THE FOREPERSON: Yes.
 11 MS. WIRTH: Okay, thank you.
 12 THE FOREPERSON: Take as long as you need.
 13 THE WITNESS: No, I just want to get a glass of
 14 water. You have it right in here? I don't even have to go
 15 out.
 16 MR. WISENBERG: I'll tell you what. There's a
 17 machine downstairs with bottled water.
 18 THE WITNESS: No, I'm okay.
 19 MR. WISENBERG: What we can do is get some water
 20 fountain water in a cup. We'd be happy to do that.
 21 THE WITNESS: I would chew a piece of gum, but I
 22 don't think that would be polite or proper. Is that all
 23 right? Then I don't need the water.
 24 MR. WISENBERG: Okay. We don't stand on ceremony
 25 here.

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1 THE WITNESS: I didn't think it was proper, you
2 know.
3 THE FOREPERSON: No, it's just fine.
4 THE WITNESS: Thank you.
5 BY MS. WIRTH:
6 Q Did Monica ever discuss with you any efforts she
7 was making to get a job in the National Security Advisor's
8 Office at the White House?
9 A No. I haven't heard this, in fact, until just now.
10 Q Okay. Did she ever ask you if you would serve as a
11 reference on her behalf in any efforts that she was making to
12 get back into the White House?
13 A I don't remember her doing that. And I don't think
14 I ever gave her a reference. I don't remember.
15 Q Do you know whether Monica had any meetings with
16 anybody at the White House about getting back in to work
17 there?
18 A No, I don't.
19 Q Do you know whether she ever met with Marsha Scott
20 in an effort to get back to the White House?
21 A That I don't know. She never told me that.
22 Q Neither Marsha Scott nor Monica?
23 A Neither one of them. I don't think I've had more
24 than two or three conversations with Marsha Scott.
25 BY MR. WISENBERG:

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1 Q I want to go back a little bit in time now. Do you
2 ever remember Monica telling you -- calling you to tell you
3 that she had met the President, like maybe the first time she
4 actually really met him or talked to him?
5 A I don't remember that. But I did -- you know,
6 again, from rumors and things like that, that she had become
7 very close to the President.
8 Q Right. No, I meant more like Monica calling you.
9 For instance, there's some indication that she chatted with
10 him, delivered pizza to him during one of the government
11 shutdowns.
12 Did she ever call you all excited to tell you that?
13 A You mean, I should deliver the pizza, too?
14 Q Pardon?
15 A I said maybe she wanted me to deliver the pizza.
16 No, she never did. First time I heard about that.
17 I tell you, in some ways this is rather
18 interesting.
19 MR. WISENBERG: I'm sorry for interrupting.
20 MS. WIRTH: That's fine.
21 BY MS. WIRTH:
22 Q After Monica left the White House and was working
23 at the Pentagon, did you ever hear anything from anybody
24 anywhere that she was back at the White House visiting?
25 A No, never heard that.

1 Q Did you ever hear from anybody that she saw the
2 President at the White House after she left?
3 A No, never heard that. In the papers, you know,
4 the newspapers.
5 Q Independent of the newspapers. No?
6 A No. When did she leave -- was she in the Pentagon
7 in '96?
8 BY MR. WISENBERG:
9 Q Our information is that she left the Pentagon on or
10 about December 26, 1997.
11 A '97? Just a few months ago, really.
12 BY MS. WIRTH:
13 Q Did you ever hear from anywhere about any efforts
14 by Monica to get a job in New York?
15 A No. First time I saw that, again, is when I read
16 it in the papers.
17 Q Did you ever call Monica and ask her whether she
18 needed any help getting a job in New York, or whether there
19 was anything you could do for her?
20 A I don't think so. I don't remember exactly,
21 though.
22 Q When is the last time that you remember speaking to
23 her?
24 A I would say somewhere about the time -- I think I
25 may have spoken to her once -- oh, wait a minute. Excuse me.

Page 1.

1 I went to a promotion ceremony at the Pentagon, and there she
2 was with Mr. Bacon.
3 Q Is that General Myers' promotion?
4
5 A General Myers, that's right. Very good.
6 Q And when was that, approximately?
7 A General Myers probably became a two-star general --
8 I don't know -- six, eight, nine months ago.
9 Q And this was at the Pentagon?
10 A This was at the Pentagon.
11 Q And Monica was there.
12 A She was there.
13 Q And you saw her.
14 A And we saw her.
15 Q Okay.
16 A In fact, that's where she introduced me to --
17 Q Mr. Bacon?
18 A -- Mr. Bacon, whom had never met before.
19 Q Do you remember anything about your conversations
20 with her that day?
21 A It was a big crowd of people, you know, and --
22 Q Were you friendly to her that day?
23 A I was friendly. I'm friendly to everybody, you
24 know. Yeah, and my wife was there.
25 Q Do you remember anything you discussed with her

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1 that day at all?
 2 A That day, no.
 3 Q Just small talk?
 4 A I don't think I discussed -- unimportant things, if
 5 I even discussed it with her. I was surprised to see her
 6 there. But I also attributed that to her aggressiveness.
 7 She knows how to, you know, get around.
 8 Q Did anybody, from the White House or anywhere else,
 9 including Monica's family, tell you Monica wants to move to
 10 New York, she wants a job in New York?
 11 A I don't remember.
 12 Q Did you know that her mother had moved to New York?
 13 A I found out about it later on.
 14 Q Later when the story broke?
 15 A Yeah.
 16 Q But you didn't know that Marcia Lewis had moved to
 17 New York?
 18 A No. Actually, I'm trying to remember. Somebody
 19 may have mentioned to me that they bumped into her. She's
 20 taking a -- I didn't know anything about it.
 21 Q That they'd bumped into her in New York City?
 22 A In New York or, you know -- I was very surprised to
 23 hear that she had -- very surprised, because I never knew
 24 what they were going to do. I still don't know to this day,
 25 and I don't care, really, if she lives in New York,

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1 Washington or Timbuktu.
 2 Q Do you have any memory whatsoever of calling Monica
 3 on the telephone and asking her if there's anything you could
 4 do for her -- or anything you could for her in New York?
 5 A I don't remember that. It's hard for me to
 6 remember that -- not remember. It's hard for me to believe I
 7 would say that. Because by that time -- I didn't even know
 8 her mother moved to New York. What I had read was that she
 9 was thinking of moving to New York for a job or something
 10 and --
 11 Q But that's after the story broke.
 12 A After the story broke.
 13 Q Let's talk about like last fall, the fall of '97,
 14 September, October, November, December. Do you remember
 15 calling Monica at all? Have you ever picked up the phone and
 16 called Monica?
 17 A I think I have.
 18 Q Okay. Have you done that --
 19 A I don't believe that recently, though. That's
 20 pretty recent.
 21 Q Last fall. Have you done that last fall?
 22 A Possible. Maybe I just felt sorry for her. I try
 23 to help people who, you know, I think are having a rough
 24 time.
 25 Q Do you ever remember picking up the phone and

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1 asking her if there's anything you could do for her?
 2 A I don't remember that, but it is possible, because
 3 that's the way I am.
 4 Q But you have no knowledge whatsoever of any desire
 5 or efforts on her part to get a job in New York prior to
 6 anything in the papers?
 7 A No, I don't remember ever her discussing that with
 8 me.
 9 Q Or anybody discussing it with you.
 10 A No, I don't remember.
 11 Q Did anybody at the White House ever pick up the
 12 phone --
 13 A No.
 14 Q -- and say, "Mr. Kaye" --
 15 A No.
 16 Q -- "Monica's trying to get a job in New York" --
 17 A "Get Monica a job in New York"?
 18 Q Well, "Monica's trying to get a job in New York.
 19 Can you do something -- is there anything you can do to try
 20 and help her?"
 21 A I don't remember that at all.
 22 BY MR. WISENBERG:
 23 Q Do you remember anybody ever calling you from the
 24 White House and saying, basically, something to this effect.
 25 And I'm not necessarily talking about the exact same time

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1 period that Ms. Wirth is.
 2 But somebody calling you from the White House and
 3 saying, "Look, Monica's been trying to get back here, and we
 4 just don't think we're going to do it, that we're going to be
 5 able to do it." Either without giving you a reason or just
 6 saying she's too aggressive, she's too hot to handle. "Can
 7 you do anything for her?"
 8 Do you remember any kind of a conversation like
 9 that?
 10 A Maybe it happened, but I really don't remember
 11 that.
 12 Q But, I mean, that would be something, if it
 13 happened in the last year, you would be likely to remember.
 14 A Maybe. Listen, sometimes I don't know what I had
 15 for breakfast in the morning.
 16 Q Well, yes, me, too. But --
 17 A That's it. You've got another 70 years to go.
 18 Q Thanks, I hope so. That would make me 124.
 19 A Oh, I believe young people like all you people will
 20 live to be 140.
 21 Q You believe that?
 22 A I believe that. That's why you're all supposed to
 23 buy drug stocks.
 24 Q Okay.
 25 A Pardon me. You've got to withdraw that.

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1 (Laughter.)
 2 I almost find this interesting in some ways.
 3 Q Why is that?
 4 A I think it's America at its best. No other country
 5 like this where a group of ordinary citizens, you know,
 6 enforce the law, really. That's the way -- I'm not a lawyer
 7 or anything, but I just think it's -- I get goosebumps as I
 8 tell it to you. I can't say enough great things about this
 9 country.
 10 It has plenty of faults like everybody -- you know,
 11 but it's just great, that a group of ordinary people conduct
 12 an investigation like this and --
 13 Nobody ever asked me about getting a job in New
 14 York.
 15 MR. WISENBERG: I want to note for the record that
 16 Mr. Kaye called me "ordinary."
 17 THE WITNESS: I apologize. I'm sorry, I apologize.
 18 MR. WISENBERG: There's nothing abnormal about me.
 19 THE WITNESS: There I go.
 20 (Laughter.)
 21 MR. WISENBERG: I'm very thankful for the
 22 statement, you understand?
 23 THE WITNESS: I don't mean that. I know you're
 24 very talented.
 25 MR. WISENBERG: No, no, I'm perfectly happy to be

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1 called normal.
 2 THE WITNESS: I'm really embarrassed. No more. I
 3 won't volunteer anything any more. I really apologize.
 4 MR. WISENBERG: No, no, no. You don't need to
 5 apologize. I was attempting to be humorous.
 6 BY MR. WISENBERG:
 7 Q All right. But the point is, to the best of your
 8 recollection, you don't remember someone calling you -- you
 9 remembered a bunch of other things, but you don't remember
 10 somebody, because of your position, calling you and saying,
 11 "Walter, Mr. Kaye, we're just not going to be able to get her
 12 back here. She's too hot to handle," anything like that.
 13 A I don't remember.
 14 Q Okay.
 15 A JUROR: Did you ever hear anything about
 16 aggressive behavior on Monica's part before she came to
 17 Washington, D.C.?
 18 THE WITNESS: Never. I didn't know her, I really
 19 didn't know her. I really got to know her after she
 20 graduated. Her mother started to put pressure on me to get
 21 the kid a job.
 22 A JUROR: Did you ever hear of any stories about
 23 Monica's aggressiveness at the Pentagon comparable to what
 24 went on at the White House?
 25 THE WITNESS: No, I never heard that. You see,

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1 it's interesting about the Pentagon. I'm associated with the
 2 Army only, and I really have no contact with, you know, the
 3 Department of Defense.
 4 For example, I'd never met Mr. Bacon. General
 5 Myers, for example, I know. He's the equivalent. He's the
 6 PA officer. But I really don't know people at the Department
 7 of Defense.
 8 I saw Secretary Cohen yesterday at a retirement
 9 ceremony right here in Washington.
 10 BY MR. WISENBERG:
 11 Q So your answer was, you didn't hear any
 12 comparable --
 13 A No.
 14 Q -- stuff, but that you might not have been in the
 15 same position because you didn't have the contacts at the
 16 Pentagon that you had at the White House. Is that a fair
 17 statement?
 18 A That's a fair statement.
 19 BY MS. WIRTH:
 20 Q Since the story became public, January 21, 1998,
 21 have you had any contact at all with Monica Lewinsky?
 22 A No, absolutely not.
 23 Q Have you spoken to Marcia Lewis?
 24 A No.
 25 Q Have you spoken to Debra Finerman?

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1 A No.
 2 Q Have they attempted to reach you?
 3 A No.
 4 Q No one has made a call to you?
 5 A No.
 6 BY MR. WISENBERG:
 7 Q You sound very firm in your answers.
 8 A Because I made up my mind I wasn't going to -- you
 9 know, absolutely wouldn't talk to them. I didn't want to
 10 have anything to do with them.
 11 Q Has anybody attempted to contact you on their
 12 behalf?
 13 A Absolutely not.
 14 Q Has Monica's attorney contacted you, Mr. Ginsburg
 15 or Mr. Speights?
 16 A No, never. Never saw them except on TV.
 17 Q Other than the call from Bruce Lindsey that you
 18 told us about earlier --
 19 A Right.
 20 Q -- have you had any contact with anybody at the
 21 White House since this story broke about Monica Lewinsky?
 22 A No.
 23 Q Have you ever discussed Monica Lewinsky with the
 24 First Lady?
 25 A No, absolutely not.

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1 Q Do you recall being interviewed by the FBI in late
2 March of '98?
3 A Yeah, just a couple of months ago, for that matter.
4 Q A couple of agents from our office --
5 A Right.
6 Q -- from the Office of Independent Counsel?
7 A Three agents, I remember that.
8 Q Did you discuss the fact that you were going to be
9 interviewed with anybody other than your attorney before you
10 had that interview?
11 A Say that again?
12 Q Did you discuss the fact that you were going to be
13 interviewed with anybody other than your attorney before you
14 had that interview?
15 A I don't understand your question.
16 Q Did you talk to anybody about the fact that you
17 were going to be interviewed by the FBI?
18 A About the FBI, or before the FBI?
19 Q Right.
20 A I told my wife, I told my kids, you know.
21 Q Other than that?
22 A Hmm?
23 Q Other than that, anybody else.
24 MR. WISENBERG: Or your attorney. We don't want to
25 hear --

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1 THE WITNESS: Oh, my attorney I --
2 MR. WISENBERG: No, we don't want to -- other than
3 your attorney.
4 BY MS. WIRTH:
5 Q Other than your attorney.
6 A Knowing myself, I probably told 50 people about it.
7 Q Okay. Did you discuss it with anybody at the White
8 House?
9 A Never.
10 Q After the interview did you discuss it with anybody
11 at the White House?
12 A Not that I remember. No. I was somewhat annoyed,
13 I was getting a little angry, you know. And then when they
14 called me back again, you know -- not angry. I was just, you
15 know -- because sometimes I feel as if -- I'm not going to
16 say that. Go ahead. You ask the questions.
17 BY MR. WISENBERG:
18 Q That's okay. Sometimes you feel as if what?
19 A Oh, I feel as if, you know, I'm made to look as if
20 I was trying to overthrow the United States Government. You
21 know what's been going on with me with newspapers and things
22 like that?
23 Q You've been bothered?
24 A Bothered? We had to change our phone number. One
25 day between the office and the house we got 122 calls. Park

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1 Avenue is blocked off with police.
2 Q Because the press was trying to get to you?
3 A That's right. I finally went down, you know. I
4 can't stay in the house indefinitely, you know.
5 But I still think, listen, this is America, free
6 press. You know, I think it's a great thing directly
7 affecting you, so --
8 THE FOREPERSON: And you asked for excitement.
9 THE WITNESS: The what?
10 THE FOREPERSON: You asked for excitement.
11 THE WITNESS: I don't know you, but I love you.
12 (Laughter.)
13 Can I say something off the record here?
14 MR. WISENBERG: It has to be on the record.
15 THE WITNESS: Yesterday I had one of the most
16 exciting experiences of my life. I end up on an aircraft
17 carrier 150 miles out of the Port of New York. I fly in in a
18 helicopter, and I'm having a heck of a good time. I like
19 that, you know.
20 I never forget my background, you know. I'm
21 nothing but a Jewish guy from The Bronx, and I can't believe
22 this. I'm really very excited.
23 BY MS. WIRTH:
24 Q Have you discussed your appearance today with
25 anyone other than your family and your lawyer?

Page 132

1 A Probably 50 or 100 people.
2 Q Friends? Anyone at the White House?
3 A No. Anybody at the White House? Yesterday I saw
4 Ann McCoy -- see, I'd never think of this -- at this
5 ceremony. It was a ceremony for the retirement of Togo West,
6 who was the Secretary of the Army and has just become
7 Secretary of Veterans Affairs. I've got to say this, one of
8 the greatest Americans that's ever lived, a terrific guy, and
9 the most eloquent speaker I've ever heard. I told Ann McCoy
10 that.
11 In fact, you want to know something? Debi Schiff
12 was there, too, and I probably told it to her, too.
13 Q Did either of them say anything to you about it?
14 A No.
15 MR. WISENBERG: Can we take a -- what we're going
16 to do is ask if you will step outside --
17 THE WITNESS: Sure.
18 MR. WISENBERG: -- back to where your attorney is
19 for a few minutes.
20 THE WITNESS: Sure.
21 MR. WISENBERG: And we'll come get you in a few
22 minutes.
23 THE WITNESS: Could I just ask you one question?
24 MR. WISENBERG: Absolutely. I don't know if I'll
25 be able to answer it.

Page 133

1 THE WITNESS: No. We happen to have a dinner party
2 tonight in New York, and I was wondering if you have any idea
3 if I'd be able to make -- get back to New York in time for
4 it.

5 MR. WISENBERG: Is it a late dinner?

6 (Laughter.)

7 MR. WISENBERG: I don't think it will be a problem.
8 I don't think so.

9 THE WITNESS: You're all invited. I'm going to a
10 dinner party on another aircraft carrier.

11 And you're going to call me?

12 MR. WISENBERG: We'll come get you.

13 (The witness was excused.)

14 (Whereupon, at 12:36 p.m., the taking of the
15 testimony in the presence of a full quorum of the Grand Jury
16 was concluded.)

17 * * * * *

1994 Income from Passthroughs

TYPE: S CORPORATION

ACTIVITY INFORMATION:

100% DISPOSITION AT A NET LOSS

ORDINARY INCOME (LOSS)

-10854

SCHEDULE E ACTIVITY INCOME (LOSS)

PAL CARRYOVER FROM 1993 - SCHEDULE E

-10854

-17739

SCHEDULE E ACTIVITY NET LOSS

-28593

TAX PREFERENCE ITEMS:

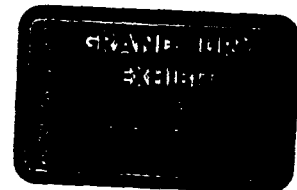
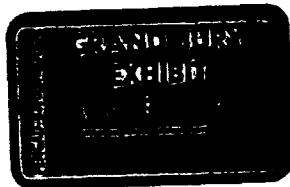
AMT PAL CARRYOVER FROM 1993 - SCHEDULE E

17013

1226-DC-00000017

1226-DC-00000018

↓ From 1994
Tax Return



MAY-14-1998 14:16

M.L. RAPID RESPONSE

P.02/02

like
vision

WALTER KAYE
SUMMIT ACCOUNT

CMA Cash Management Account

0996

April 21, 93

Pay to the order of Beverly Hills Magazine

\$ 30,000.00

For Merrill Lynch

Walter Kaye

0003000000

26

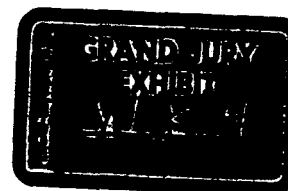
037

Beverly Hills Magazine

Capital Stock

50 shares

1226-DC-00000019



SCHEDULE K-1
(Form 1120S)
Shareholder's Share of Income, Credits, Deductions, etc.

OMB No. 1545-0130

1993

 Department of the Treasury
 Internal Revenue Service

 ▶ See separate instructions for shareholders.
 For calendar year 1993 or tax year
 beginning 1 - 1, 1993, and ending 12 - 31, 19

 Shareholder's identifying number ▶ [REDACTED]
 Shareholder's name, address, and ZIP code
Walter Kaye
[REDACTED]
[REDACTED]

 Corporation's identifying number ▶ [REDACTED]
 Corporation's name, address, and ZIP code
Beverly Hills Magazine
700 N Trenton Dr
Beverly Hills, CA 90210

- A Shareholder's percentage of stock ownership for tax year (see instructions for Schedule K-1) %
- B Internal Revenue Service Center where corporation filed its return ▶ Fresno CA
- C Tax shelter registration number (see instructions for Schedule K-1) ▶
- D Check applicable boxes: (1) ☐ Final K-1 (2) ☐ Amended K-1

(a) Pro rata share items		(b) Amount	(c) Form 1040 filers enter the amount in column (b) on:
Income (Loss)	1 Ordinary income (loss) from trade or business activities	1 <u>[REDACTED]</u>	See Shareholder's Instructions for Schedule K-1 (Form 1120S).
	2 Net income (loss) from rental real estate activities	2	
	3 Net income (loss) from other rental activities	3	
	4 Portfolio income (loss):		
	a Interest	4a	Sch. B, Part I, line 1 Sch. B, Part II, line 5 Sch. E, Part I, line 4 Sch. D, line 5, col. (f) or (g) Sch. D, line 13, col. (f) or (g) (Enter on applicable line of your return.) See Shareholder's Instructions for Schedule K-1 (Form 1120S) (Enter on applicable line of your return.)
	b Dividends	4b	
	c Royalties	4c	
	d Net short-term capital gain (loss)	4d	
	e Net long-term capital gain (loss)	4e	
	f Other portfolio income (loss) (attach schedule)	4f	
5 Net gain (loss) under section 1231 (other than due to casualty or theft)	5	See Shareholder's Instructions for Schedule K-1 (Form 1120S) (Enter on applicable line of your return.)	
6 Other income (loss) (attach schedule)	6		
Deductions	7 Charitable contributions (see instructions) (attach schedule)	7	Sch. A, line 13 or 14 See Shareholder's Instructions for Schedule K-1 (Form 1120S).
	8 Section 179 expense deduction	8	
	9 Deductions related to portfolio income (loss) (attach schedule)	9	
	10 Other deductions (attach schedule)	10	
Investment Interest	11a Interest expense on investment debts	11a	Form 4952, line 1 See Shareholder's Instructions for Schedule K-1 (Form 1120S).
	b (1) Investment income included on lines 4a, 4b, 4c, and 4f above	b(1)	
	(2) Investment expenses included on line 9 above	b(2)	
Credits	12a Credit for alcohol used as fuel	12a	Form 6478, line 10 1226-DC-00000020 Form 8586, line 5 GRAND JURY EXHIBIT See Shareholder's Instructions for Schedule K-1 (Form 1120S).
	b Low-income housing credit:		
	(1) From section 42(j)(5) partnerships for property placed in service before 1990	b(1)	
	(2) Other than on line 12b(1) for property placed in service before 1990	b(2)	
	(3) From section 42(j)(5) partnerships for property placed in service after 1989	b(3)	
	(4) Other than on line 12b(3) for property placed in service after 1989	b(4)	
	c Qualified rehabilitation expenditures related to rental real estate activities (see instructions)	12c	
	d Credits (other than credits shown on lines 12b and 12c) related to rental real estate activities (see instructions)	12d	
	e Credits related to other rental activities (see instructions)	12e	
	13 Other credits (see instructions)	13	
Adjustments and Tax Preference Items	14a Depreciation adjustment on property placed in service after 1986	14a	See Shareholder's Instructions for Schedule K-1 (Form 1120S) and Instructions for Form 6251
	b Adjusted gain or loss	14b	
	c Depletion (other than oil and gas)	14c	
	d (1) Gross income from oil, gas, or geothermal properties	d(1)	
	(2) Deductions allocable to oil, gas, or geothermal properties	d(2)	
	e Other adjustments and tax preference items (attach schedule)	14e	

SCHEDULE K-1
(Form 1120S)
Shareholder's Share of Income, Credits, Deductions, etc.

OMB No. 1545-0130

▶ See separate instructions.

Department of the Treasury
Internal Revenue Service

beginning

For calendar year 1994 or tax year

1, 1, 1994, and ending

12, 31, 19

Shareholder's identifying number ▶

Corporation's identifying number ▶

Shareholder's name, address, and ZIP code

Corporation's name, address, and ZIP code

Walter Kaye

Beverly Hills Magazine

A Shareholder's percentage of stock ownership for tax year (see Instructions for Schedule K-1) ▶ %

B Internal Revenue Service Center where corporation filed its return ▶ Fresno, CA

C Tax shelter registration number (see Instructions for Schedule K-1) ▶

D Check applicable boxes: (1) ☒ Final K-1 (2) ☐ Amended K-1

(a) Pro rata share items

(b) Amount

(c) Form 1040 filers enter
the amount in column (b) on:

	(a) Pro rata share items	(b) Amount	(c) Form 1040 filers enter the amount in column (b) on:	
Income (Loss)	1 Ordinary income (loss) from trade or business activities	1	See Shareholder's Instructions for Schedule K-1 (Form 1120S).	
	2 Net income (loss) from rental real estate activities	2		
	3 Net income (loss) from other rental activities	3		
	4 Portfolio income (loss):			
	a Interest	4a	Sch. B, Part I, line 1	
	b Dividends	4b	Sch. B, Part II, line 5	
	c Royalties	4c	Sch. E, Part I, line 4	
	d Net short-term capital gain (loss)	4d	Sch. D, line 5, col. (f) or (g)	
	e Net long-term capital gain (loss)	4e	Sch. D, line 13, col. (f) or (g)	
	f Other portfolio income (loss) (attach schedule)	4f	(Enter on applicable line of your return.)	
5 Net gain (loss) under section 1231 (other than due to casualty or theft)	5	See Shareholder's Instructions for Schedule K-1 (Form 1120S).		
6 Other income (loss) (attach schedule)	6	(Enter on applicable line of your return.)		
7 Charitable contributions (see instructions) (attach schedule)	7	Sch. A, line 15 or 16		
8 Section 179 expense deduction	8	See Shareholder's Instructions for Schedule K-1 (Form 1120S).		
9 Deductions related to portfolio income (loss) (attach schedule)	9			
10 Other deductions (attach schedule)	10			
Credits	11a Interest expense on investment debts	11a	Form 4952, line 1	
	b (1) Investment income included on lines 4a, 4b, 4c, and 4f above	b(1)	See Shareholder's Instructions for Schedule K-1 (Form 1120S).	
	(2) Investment expenses included on line 9 above	b(2)		
	12a Credit for alcohol used as fuel	12a	Form 6478, line 10	
	b Low-income housing credit:		Form 8586, line 5	
	(1) From section 42(j)(5) partnerships for property placed in service before 1990	b(1)		
	(2) Other than on line 12b(1) for property placed in service before 1990	b(2)		
	(3) From section 42(j)(5) partnerships for property placed in service after 1989	b(3)		
	(4) Other than on line 12b(3) for property placed in service after 1989	b(4)		
	c Qualified rehabilitation expenditures related to rental real estate activities (see instructions)	12c	See Shareholder's Instructions for Schedule K-1 (Form 1120S).	
	d Credits (other than credits shown on lines 12b and 12c) related to rental real estate activities (see instructions)	12d		
	e Credits related to other rental activities (see instructions)	12e		
	13 Other credits (see instructions)	13		
	14a Depreciation adjustment on property placed in service after 1986	14a	See Shareholder's Instructions for Schedule K-1 (Form 1120S) and Instructions for Form 6251	
b Adjusted gain or loss	14b			
c Depletion (other than oil and gas)	14c			
d (1) Gross income from oil, gas, or geothermal properties	d(1)			
(2) Deductions allocable to oil, gas, or geothermal properties	d(2)			
e Other adjustments and tax preference items (attach schedule)	14e			

1226-DC-00000022

NUMBER

3

INCORPORATED UNDER THE LAWS OF

SHARES

50

THE STATE OF
CALIFORNIA

BEVERLY HILLS MAGAZINE

10,000 SHARES COMMON STOCK, NO PAR VALUE

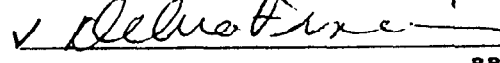
This Certifies that WALTER KAYE is the owner of

*****Fifty (50)*****

fully paid
and non-assessable Shares of the Capital Stock of the above named Corporation
transferable only on the books of the Corporation by the holder hereof in person or
by duly authorized Attorney upon surrender of this Certificate properly endorsed.

In Witness Whereof, the said Corporation has caused this Certificate to be signed by its duly authorized officers
and its Corporate Seal to be hereunto affixed this 19th day of April A. D. 1993


MARCIA LEWIS SECRETARY/TREASURER


DEBRA FINERMAN PRESIDENT



1226-DC-00000023

The following abbreviations, when used in the inscription of ownership on the face of this certificate, shall be construed as if they were written out in full according to applicable laws or regulations. Abbreviations, in addition to those appearing below, may be used:

JT TEN As joint tenants with right of survivorship and
not as tenants in common

TEN COM As tenants in common

TEN ENT
UNIF GIFT MIN ACT
CUST

As tenants by the entireties
Uniform Gifts to Minors Act
Custodian for

For Value Received, _____ *hereby sell, assign and transfer unto*

PLEASE INSERT SOCIAL SECURITY OR OTHER
IDENTIFYING NUMBER OF ASSIGNEE

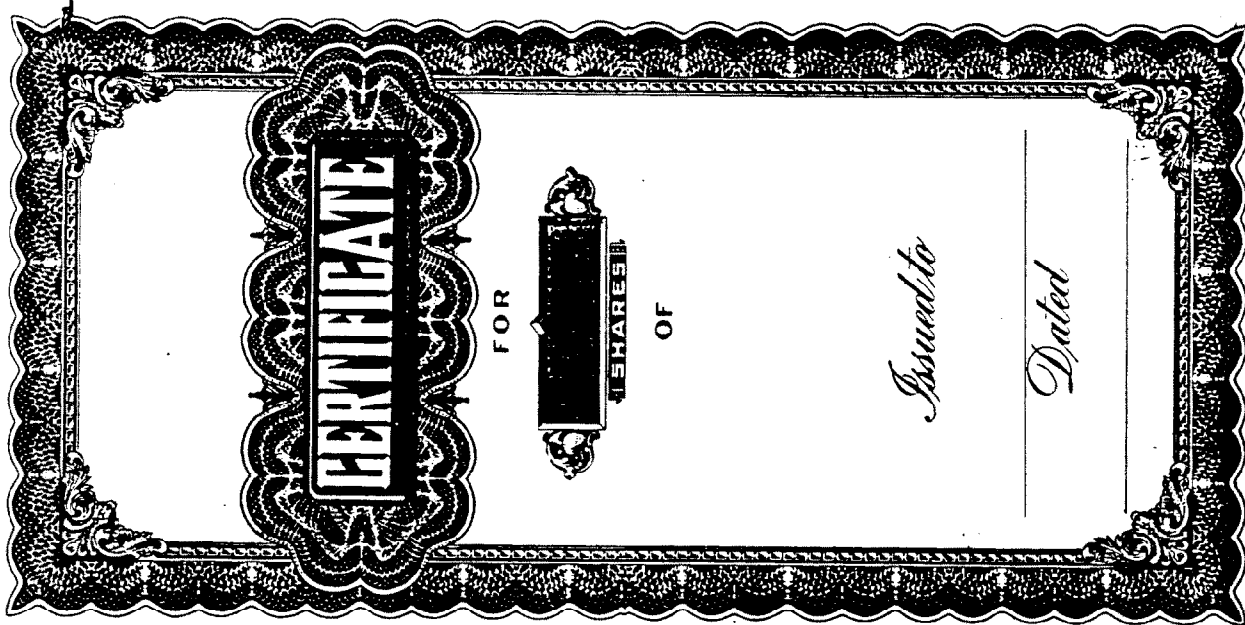
_____ *Shares represented by the within*
Certificate, and do hereby irrevocably constitute and appoint

_____ *Attorney*
to transfer the said Shares on the books of the within named Corporation with
full power of substitution in the premises.

Dated _____ *19* _____

In presence of _____

NOTICE: THE SIGNATURE OF THE ASSIGNEE MUST CORRESPOND WITH THE
NAME AS WRITTEN UPON THE FACE OF THE CERTIFICATE. IN EVERY PARTICULAR
WITHOUT ALTERATION OR ENLARGEMENT OR ANY CHANGE IN NUMBER.



1226-DC-000000024

THE WALTER KAYE
SPECIAL ACCOUNT
[REDACTED]

7332

PAY
TO THE
ORDER OF

Marcia Lewis

DATE Nov. 25, 1996

1-12 0937
210

Ten Thousand 44/100

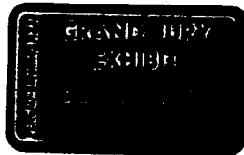
\$10,000 44/100

DOLLARS ☒ ☐

CHEMICAL
CHEMICAL BANK
633 THIRD AVENUE
NEW YORK, NY 10017

FOR

Walter Kaye
"000 1000000"



1226-DC-00000025

Dr. J. E. ...

*Pay to the order of
Bella Finnerman*

[REDACTED]

[REDACTED]

DEC - 4 '36

PROCESSED
BY THE
FBI
DEC 11 1936

RIGGS BANK N.A.

12/64/36

[REDACTED]

12/65/36

[REDACTED]

BEVERLY HILLS MAGAZINE

VOL. 1 NO. 1

PREMIER ISSUE

\$2.95

ESCADA • BH SEXIEST MAN POLL • POLO

*Is it better
than Chanel?*

PASTA LA VISTA, BABY!

Schatzi on Main

1226-DC-00000027



BEVERLY HILLS MAGAZINE

VOL. 1 NO. 2

\$2.95

1226-DC-00000028



Gianni Versace & Gabbana

2066

DOCUMENT ① h:\data\ann\ patsy



MEMORANDUM

October 23, 1995

TO: Walter Kaye
[REDACTED] fax

FROM: Ann McCoy

RE: Resume - Monica Lewinsky

Today I received the enclosed memo from Patsy Thomasson, Deputy Director of the Office of Presidential Personnel.

I will let you know immediately if I have any further information from Patsy's office.

V006-DC-00003748


HB 004660

2067

THE WHITE HOUSE
WASHINGTON

COPY OF ENCLOSURE WITH DOCUMENT ①

MEMORANDUM

October 17, 1995

OCT 23 1995



TO: ANN McCOY
FROM: PATSY THOMASSON
RE: RESUME - MONICA LEWINSKY

cc: Maggie Williams

Thank you for taking the time to forward the resume of Monica Lewinsky. The job situation is very tight with the lack of budgets throughout the government.

We will keep her resume on file and forward it to appropriate agencies if openings become available.

V006-DC-00003749

HB 004661

OK - Beverly Hills Magazine.

4/26/93

Publishing - ^{NHK} Incorp In L.A. -
 Not Incorporated -
 Sub. S - Tax
 At 30% as an investment -

Two Sisters + wk -

↓

Writing/Publishing
 Low Overhead No office - Unpaid Writers
 Art Director - Small Staff
 Independent Contractor

Two issues to date - Quarterly

LOS ANGELES / BEVERLY HILLS -

1226-DC-00000001



OFFICE COPY

COHEN AND RANDALL
COUNSELLORS AT LAW

NORMAN H. COHEN*
MARTIN E. RANDALL
*ALSO MEMBER OF FLORIDA BAR -
FELIX G. LANGER (1901-1991)
OF COUNSEL
OUT OF STATE: 800-223-6840
TELEX: 668166 UW
TELECOPIER: 616-877-2736

FROM:
NEW YORK CITY OFFICE ☐
THREE PARK AVENUE
NEW YORK, NEW YORK 10016
212-686-1261
GARDEN CITY OFFICE ☒
1100 FRANKLIN AVENUE
GARDEN CITY, NEW YORK 11530
516-877-2720
718-343-0910

March 26, 1993

Mr. Walter Kaye
475 Park Avenue
New York, NY 10022

RE: Beverly Hills Magazine

Dear Walter:

At your suggestion, Deborah Lewis called me today to discuss operations of the Magazine and your proposed investment or loan of \$30,000.

Deborah and her sister are publishing the Magazine as partners. At my suggestion, they will speak with their accountant and an attorney (to be recommended by their accountant) regarding formation of a corporation, primarily to protect them from personal liability for debts of the Magazine, including possible libel suits. I told them that I would be available to their accountant and/or attorney if questions arise.

It is probable that they will elect to be taxed as an "S Corporation", but this is not a certainty. They now know that the corporation should be organized before monies are received from you, to avoid their having personal liability on a loan from you. At the same time, you do not want to be a general partner of the partnership. In summary, from your view and theirs, your check for \$30,000 should not be sent until a corporation is organized and it is determined whether you are to be a stockholder or creditor. I assume that they will contact you directly in this regard.

At my request, Deborah is sending me a sample issue of their publication.

If I hear from them again, I shall tell you.

Sincerely yours,

1226-DC-00000002

Norman H. Cohen

Beverly Hills Magazine

10790 Wilshire Boulevard
Suite #1401, Los Angeles, CA 90024
Tel (310) 276-8252 • Fax (310) 470-4714

March 26, 1993

Mr. Norman Cohen
Cohen & Randall
1100 Franklin
Garden City, N.Y. 11530

Dear Mr. Cohen,

It was a pleasure talking to you on the phone today. Please find enclosed two issues of our magazine. Response has been very good, as we fill a niche here in Beverly Hills. There is no other four color glossy metropolitan magazine here in our city.

Our attorney has started proceedings for incorporation and expects it to be completed by Tuesday, March 30th. I hope we can complete anything you feel necessary. If there is something you think we should do, we will do it as speedily as possible.

Thank you so much for your invaluable advice, and I hope to be talking to you soon.

Best regards,



Debra Lewis Finerman
Editor

1226-DC-00000003

DLF:sd

Wt

Beverly Hills Magazine

2/13 - Rec call from Deborah Lewis [REDACTED]

① Incorporation as of 3/29/95.

DL spoke w/ atty on 7/6 immediately after speaking with NHC

② DL questioned - Loan or Stock for by Wt - NHC told her Wt wants to do what is best for DL & Sister.

Call back from DL and her acct.

Deanna Decker CPA / Deborah Lewis Conf Call w/ NHC

DD suggested Corp - (90% certainty changed to 100% certainty)

Fixed Term loan with interest -

Longer Term Note w/ Option to prepay

NHC: Offering Federal Specified Interest Rates

5 Yr Term w/ Option to prepay -

MER

ASAP please prepare Note

M.D. term

30,000

5 Yr Term

Fixed Rate

Option to Prepay

MER Note not used Stock purchased

WIC

Beverly Hills Magazine, Inc.

4/5/93. Call from Detroit here -

12th pm ① BEVERLY HILLS MAGAZINE, INC. is name of corp.

② DL & Sister spoke w/ WK/SK over weekend - DL believes WK prefers Sub S investment -

③ DL wants to do whatever pleases Walter.

SFC MER - MER already dropped note w/ Name of Corp. Missing

LAW OFFICES OF
HARRY C. TAUB
A PROFESSIONAL CORPORATION

HARRY C. TAUB*
DOUGLAS A. FRYMER
PETER G. BUREGA
KRISTINE M. FRIEDMAN

2049 CENTURY PARK EAST, SUITE 710
LOS ANGELES, CALIFORNIA 90067
TELEPHONE (310) 288-0102
FACSIMILE (310) 288-0117

P.O. BOX 1030
SANTA CRUZ, CALIFORNIA 95073
TELEPHONE (408) 479-5485
FACSIMILE (408) 479-5489

*ADMITTED TO U.S. TAX COURT

April 13, 1993

FAXED

Via Facsimile & U.S. Mail
516-877-2736

Mr. Norman Cohen
COHEN & RANDALL
1100 Franklin Avenue
Garden City, New York 11530

Re: Beverly Hills Magazine

Dear Mr. Cohen:

We enclose herewith the following items for your review and action purposes and pursuant to our telephonic discussion of the 13th day of April, 1993:

1. Articles of Incorporation of BEVERLY HILLS MAGAZINE;
2. Stock Purchase Agreement for execution by your client;
3. Form 2553 "Election by a Small Business Corporation" to be executed by your client as an additional shareholder. You will note that we need not only your client's signature but also your client's Social Security Number on this particular Election form.

It is our understanding that your client will be transmitting the \$30,000.00 purchase price directly to Mrs. Finerman. Once we are informed of the receipt of the payment by your client then, in that event, we will ensure the issuance of shares to your client (based upon our receipt of Stock Certificates from the lithographer).

We thank you for your anticipated cooperation in this matter.

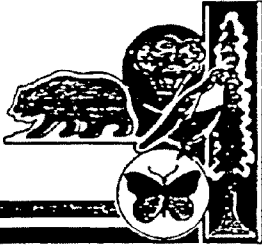
Sincerely,



HARRY C. TAUB

HCT/dlk
Enclosures

1226-DC-00000006



State of California

OFFICE OF THE SECRETARY OF STATE

1722754

CORPORATION DIVISION

I, *MARCH FONG EU*, Secretary of State of the State of California, hereby certify:

That the annexed transcript has been compared with the corporate record on file in this office, of which it purports to be a copy, and that same is full, true and correct.

IN WITNESS WHEREOF, I execute
this certificate and affix the Great
Seal of the State of California this

APR 1 1993



March Fong Eu

Secretary of State

1226-DC-00000007

1722754

COPY

ENDORSED
FILED

ARTICLES OF INCORPORATION

In the office of the Secretary of State
of the State of California

OF

MAR 31 1993

BEVERLY HILLS MAGAZINE

I

MARCH FONG EU, Secretary of State

The name of this corporation is BEVERLY HILLS MAGAZINE.

II

The purpose of this corporation is to engage in any lawful activity for which a corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.

III

The name and address in the State of California of this corporation's initial agent for service of process is: Harry C. Taub, Esq., 2049 Century Park East, Suite 710, Los Angeles, California 90067.

IV

This corporation is authorized to issue only one class of shares of stock; and the total number of shares which this corporation is authorized to issue is 10,000.

Dated: March 31, 1993



HARRY C. TAUB, Incorporator

I hereby declare that I am the person who executed the foregoing Articles of Incorporation, which execution is my act and deed.



HARRY C. TAUB

1226-DC-00000008

STOCK PURCHASE AGREEMENT

THIS STOCK PURCHASE AGREEMENT ("AGREEMENT"), made effective as of this 15th day of April, 1993, between BEVERLY HILLS MAGAZINE, a California corporation (hereinafter called "Seller" or "Corporation") and WALTER KAYE (hereinafter called "Purchaser").

W I T N E S S E T H:

In consideration of the promises and mutual agreements hereinafter contained, Seller and Purchaser agree as follows:

1. Representations and Warranties. Seller represents and warrants to the Purchaser that this Agreement is made in reliance on the following:

(a) BEVERLY HILLS MAGAZINE (the "Company") has been duly incorporated and is validly existing and in good standing as a corporation under the laws of California.

(b) The Company has a total of 10,000 shares of capital stock (the "Shares"). The Company has no outstanding obligations, understandings or commitments regarding the issuance of any additional shares or any options, rights or warrants concerning the issuance of any additional shares or securities convertible into shares.

(c) Seller has good, marketable and indefeasible title to and full power of disposition over and has full right to sell and transfer to the Purchaser all Shares to be sold by such Seller; and the Shares are free of all liens, claims, debts, or other

04/13/93 12:17

0006

encumbrances, and shall be free of all such liens, claims, debts, or other encumbrances upon their transfer to the Purchaser under this Agreement.

(d) Seller is authorized to enter into this Agreement.

2. Sale of Shares. At the Closing, Seller shall sell, transfer, and deliver to the Purchaser 50 shares for a purchase price of \$30,000.00 (for the terms set forth in Exhibit "A" hereto).

3. Closing. The sale and purchase of the Shares shall be consummated at Los Angeles, California on April 15, 1993 at 10:00 a.m., or as soon thereafter as possible, by delivery to Purchaser of: (1) certificates for the Shares duly ~~endorsed for assignment~~ ^{REGISTERED IN} ~~and transfer, or accompanied by duly executed stock powers;~~ ^{NAME OF PURCHASER;} (2) against payment and transfer of consideration identified herein. The time of delivery and payment is herein called the "Closing Date".

4. Conditions of Purchaser's Obligations. Purchaser's obligation to purchase the Shares from Seller is subject to the following conditions:

(a) The representations and warranties of the Seller stated in Paragraph 1 shall be true as of the Closing Date and there shall have been no material adverse changes in the financial conditions or affairs of the Company between the date of this Agreement and the Closing Date; and a certificate to all of such effects signed by the Sellers shall be delivered to Purchaser on the Closing Date.

1226-DC-00000010

(b) All of the Shares shall be concurrently sold to Purchaser.

5. Survival of Representations and Warranties. The representations, warranties and covenants of Seller herein shall remain in full force regardless of any investigation or approval by Purchaser, and shall survive the delivery of the Shares to Purchaser.

6. Assignment. This Agreement shall be binding upon, inure to the benefit of, and be enforceable by the heirs, administrators, executors, and assigns of Seller and Purchaser.

7. Governing Law. This Agreement shall be governed by the laws of the State of California.

8. Entire Agreement. This Agreement contains the entire agreement of the parties hereto, and supersedes any prior written or oral agreements between them concerning the subject matter contained herein. There are no representations, agreements, arrangements or understandings, oral or written, between and among the parties hereto, relating to the subject matter contained in this Agreement, which are not fully expressed herein.

9. Attorney's Fees. In the event it becomes necessary to commence any proceeding or actions to enforce the provisions of this Agreement, or any and all of the terms and conditions thereof, the Court or other tribunal before which the same shall be tried, reviewed, and/or arbitrated, shall award to the prevailing party all costs and expense thereof including, but not limited to any and all actual attorneys fees, costs, and/or other expenses and/or

04/13/93 12:19

008

interest in connection therewith.

IN WITNESS WHEREOF, this Agreement has been fully executed by the parties hereto on the date first above written at Los Angeles, California.

BEVERLY HILLS MAGAZINE

By *Debra Finerman*

DEBRA FINERMAN, President

"Seller"

By *Walter Kaye*

WALTER KAYE

"Buyer"

1226-DC-00000012

04/13/93 12:19

009

EXHIBIT "A"

Total purchase price of \$30,000.00, payable in cash, on April 15, 1993.

1226-DC-00000013

WALTER KAYE
SUMMIT ACCOUNT
CMATM Cash Management Account[®]

0996

April 21, 1993

 $\frac{25.80}{440}$ Pay to the
order of

Dorothy Hills Magazine

Twenty Thousand and ~~no~~\$ 30,000⁰⁰~~xx~~

Dollars

 Merrill Lynch

BANK ONE, COLUMBUS, N.A. COLUMBUS (IND 43271)

Memo

San Jose

Walter Kaye

1226-DC-00000014

2082

1226-DC-00000015

6/9/93 - NAC Called Funk -

He did not know that we had
signed return Form 2553 - A
Second form is not required.

LAW OFFICES OF
HARRY C. TAUB
A PROFESSIONAL CORPORATION

HARRY C. TAUB*
DOUGLAS A. FRYMER
PETER G. BUREGA
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TELEPHONE (408) 479-5485
FACSIMILE (408) 479-5489

*ADMITTED TO U.S. TAX COURT

May 17, 1993

Certified Mail
Return Receipt Requested

Norman H. Cohen, Esq.
COHEN AND RANDALL
1100 Franklin Avenue
Garden City, New York 11530

Re: Beverly Hills Magazine

Dear Mr. Cohen:

We enclose herewith, for your information and action purposes, the following documents with respect to the captioned entity and your client's (Walter Kaye's) interest therein:

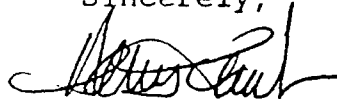
1. An Election by Small Business Corporation. Please ensure that you obtain Mr. Kaye's signature at the red check mark and return the originally executed Form 2553 to our offices for further processing with the Internal Revenue Service.

2. Stock Certificate Number 3, issued to Walter Kaye, for 50 shares of BEVERLY HILLS MAGAZINE. Please ensure that Mr. Kaye executes the "receipt" portion of the Stock Certificate and detaches same from the original Certificate. The original Stock Certificate should be kept in a place of safekeeping by Mr. Kaye; the executed "receipt" stub should be returned to our offices for placement into the Corporate Minute Book.

3. A fully executed copy of the STOCK PURCHASE AGREEMENT for your client's records.

If you have any questions regarding this matter, please do not hesitate to call at any time. We thank you at this time for your continuing cooperation and assistance.

Sincerely,



HARRY C. TAUB

1226-DC-00000016

HCT/dlk
Enclosures

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/14/98

JANIS FAYE KEARNEY, black, female, date of birth [REDACTED], Social Security Account Number [REDACTED], Special Assistant to the President and Records Manager, was apprised of the official identity of the interviewing Agent and the nature of the interview. Also present for the interview, conducted at the Wilson conference room of the White House Conference Center on Jefferson Place, were Associate Independent Counsel (AIC) DARRYL JOSEPH and Associate White House Counsels MICHELLE PETERSON and CARL RACINE. KEARNEY provided the following information:


KEARNEY has worked at the White House since December of 1995. KEARNEY's supervisor is NANCY HERNREICH. Prior to working at the White House, KEARNEY worked at the Small Business Administration as the Public Affairs Director. KEARNEY advised she has a background in journalism. KEARNEY is responsible for the Daily summaries, which document the President's activities. KEARNEY works on the summaries throughout the day.

KEARNEY advised the summary is a compilation of many things including the summary of morning meetings chaired by the Chief of Staff, summaries of news stories, and input from other meetings and events taking place in the White House. KEARNEY advised her records are not as detailed as the Presidential diaries. KEARNEY advised she and NANCY HERNREICH decided what was to go into KEARNEY's summaries.

KEARNEY advised that the purpose of her summaries is for an historical record of the Presidency. The summaries may include some movements of the President, but tracking his movement is not the purpose of the summary.

KEARNEY advised she recently did a computerized "search" on her summaries and came up with no "hits" on the name MONICA LEWINSKY.

Investigation on 2/4/98 at Washington, DC File # 29D-OIC-LR-35063
by [REDACTED] Date dictated 2/4/98



UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA		GRAND JURY EXHIBITS: (continued)		Page 3
----- X		No. JFK-18	Presidential schedule for 6/24/97	77
:		No. JFK-19	Presidential schedule for 7/4/97	78
:		No. JFK-20	Presidential schedule for 7/14/97	79
:		No. JFK-21	Presidential schedule for 7/16/97	80
:		No. JFK-22	Presidential schedule for 7/24/97	80
----- X		No. JFK-23	Presidential schedule for 8/16/97	81
		No. JFK-24	Presidential schedule for 9/11/97	81
		No. JFK-25	Presidential schedule for 9/12/97	83
		No. JFK-26	Presidential schedule for 9/22/97	84
		No. JFK-27	Presidential schedule for 10/11/97	84
		No. JFK-28	Presidential schedule for 11/13/97	85
		No. JFK-29	Presidential schedule for 12/6/97	86
		No. JFK-30	Presidential schedule for 12/15/97	87
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		No. JFK-32	Map of West Wing	13
		No. JFK-33	Presidential call log for 12/15/97	34
		No. JFK-34	Presidential call log for 1/9/98	
			Signal Switchboard	34
		No. JFK-35	Presidential call log for 6/14/96	34

Grand Jury Room No. 3		Page 2		Page 4
United States District Court		C O N T E N T S		1 P R O C E E D I N G S
for the District of Columbia				2 Whereupon,
3rd & Constitution, N.W.				3 JANIS FAYE KEARNEY
Washington, D.C. 20001				4 was called as a witness and, after having been duly sworn by
Tuesday, April 7, 1998				5 the Foreperson of the Grand Jury, was examined and testified
				6 as follows:
The testimony of JANIS FAYE KEARNEY was taken in				7 EXAMINATION
the presence of a full quorum of Grand Jury 97-2, impaneled				8 BY MR. BINHAK:
on September 19, 1997, commencing at 9:35 a.m., before:				9 Q Good morning, Ms. Kearney. Could you state your
MARY ANNE WIRTH				10 name and spell your full name for the record?
STEPHEN BINHAK				11 A My name is Janis Faye Kearney, J-a-n-i-s F-a-y-e
Associate Independent Counsel				12 K-e-a-r-n-e-y.
Office of Independent Counsel				13 Q My name is Stephen Binhak and this is Mary Anne
1001 Pennsylvania Avenue, Northwest				14 Wirth. We both work for the Independent Counsel, Ken Starr.
Suite 490 North				15 We're doing an investigation of a criminal investigation of
Washington, D.C. 20004				16 possible violations of federal law, including perjury,
				17 obstruction of justice and conspiracy. Do you understand
				18 that?
				19 A Yes.
				20 Q We are both associate independent counsels.
				21 This is the court reporter and these are the grand jurors.
				22 When you give answers to any of the questions
				23 today, you have to give an audible answer because what you
				24 say is being recorded and please try to speak up. Do you
				25 understand that?

Page 5

Page 7

1 A Yes.
 2 Q I want to advise you of what we call the rights and
 3 responsibilities of witnesses who appear before the grand
 4 jury and I'm just going to along the way ask you to tell me
 5 whether you understand what I'm telling you, just for the
 6 record. Do you understand that?
 7 A Yes.
 8 Q You have a right against self-incrimination, which
 9 means that you don't have to say anything which may
 10 incriminate you. Do you understand that?
 11 A Yes.
 12 Q And what you do say here can be used against you in
 13 another grand jury or any legal proceedings. Do you
 14 understand that?
 15 A Yes.
 16 Q If you have a lawyer outside, you have the right to
 17 go out and speak to the lawyer at any time that you feel is
 18 necessary. Do you understand that?
 19 A Yes.
 20 Q And you'll have a reasonable opportunity to consult
 21 with your lawyer any time you do go outside. You may know,
 22 but your lawyer can't be in here with you. Do you understand
 23 that?
 24 A Yes.
 25 Q I understand that you do have a lawyer here today,

1 circumstances. Do you understand that?
 2 A Yes.
 3 Q Also, under the Independent Counsel statute,
 4 which is the statute that gives our office the authority to
 5 investigate crimes, there are certain limited exceptions
 6 where grand jury testimony may be made public, such as the
 7 reporting function that we have to the Congress. Do you
 8 understand that?
 9 A Yes.
 10 Q Now, there are different kinds of witnesses who
 11 appear in front of the grand jury and I want to make sure you
 12 understand the differences between each. The first kind of
 13 person is a target and a target is defined as a person
 14 about whom the prosecutor or the grand jury has substantial
 15 evidence that links the person, the target, to the commission
 16 of a crime and who in the judgment of the prosecutor is a
 17 putative defendant. Do you understand what I've just said?
 18 A Yes.
 19 Q All right. You are not a target at this time.
 20 Do you understand that?
 21 A Yes.
 22 Q Of course, you also understand that there is no way
 23 that anybody can ever promise anyone else that they will
 24 never be a target ever, just because that's impossible to do.
 25 Do you understand that?

Page 6

Page 6

1 is that correct?
 2 A That's correct.
 3 Q And could you state the name of your lawyer for the
 4 record?
 5 A Dan Standish.
 6 Q Would you spell that, please?
 7 A D-a-n S-t-a-n-d-i-s-h.
 8 Q Now, you need to know that we, meaning Ms. Wirth
 9 and I, the court reporter and the grand jurors are all bound
 10 by an oath of secrecy. That means that subject to some very
 11 well defined exceptions we can't go out and announce to the
 12 world, or anybody, for that matter, what you've said and
 13 what's gone on today. Do you understand that?
 14 A Yes.
 15 Q I want to go over some of those exceptions with
 16 you, but as a general matter, we just can't talk. If you
 17 were to testify later at a trial and you were to say
 18 something that was different or at odds with what you said
 19 today, then your testimony could be made public in that
 20 setting. Do you understand that?
 21 A Yes.
 22 Q We also have certain people that work with us,
 23 including FBI agents, and for investigative purposes it is
 24 sometimes necessary for us to share what goes on in the
 25 grand jury with them, so we will do that under certain

1 A Yes.
 2 Q But right now, you are not a target. The second
 3 category of witnesses is called a subject and a subject is a
 4 person whose conduct is within the scope of the grand jury.
 5 Do you understand that?
 6 A Yes.
 7 Q Okay. A subject would be a person who falls in a
 8 wide category, a person who is engaged in activity that the
 9 grand jury is interested in and that could be as simple as in
 10 the case of a bank robbery a person who was waiting in line
 11 when the bank robbery occurred up to the teller who gave the
 12 money over to a security guard in the bank or even including
 13 a person standing outside the bank who saw the bank robbers
 14 get away. Do you understand that?
 15 A Yes.
 16 Q Okay. That's what a subject is. As a technical
 17 matter, because that's such a broad category, you're a
 18 subject. Do you understand that?
 19 A Yes.
 20 Q There's a third informal category that's developed
 21 among criminal lawyers and prosecutors called a witness and
 22 that is for the group of people who are subjects who are jus-
 23 purely witnesses. In the example I gave you before, the
 24 person who is just standing outside the bank and watches the
 25 robber flee the scene. Do you understand that?

1 A Yes.

2 Q You are a witness. Do you understand that you are
3 a witness?

4 A Yes.

5 Q Okay. And, obviously, just like with a target, we
6 can never promise you that you will always remain a witness
7 ever because that's just something that we can't do. Do you
8 understand that?

9 A Yes.

10 Q Now, you're here today because you've received a
11 subpoena from the grand jury. Is that correct?

12 A Correct.

13 Q Did the subpoena request that you bring along any
14 documents?

15 A No.

16 Q Just you for testimony?

17 A Yes.

18 Q Now, you need to know that you've been sworn
19 to tell the truth by the grand jury forewoman. Do you
20 understand that?

21 A Yes.

22 Q And if you intentionally say something that's
23 incorrect, if you misstate a fact or you lie under oath,
24 then you can be prosecuted for perjury, which is a felony,
25 which carries a possible sentence of jail time and a fine.

1 it again?

2 A Special Assistant to the President and Records
3 Manager.

4 Q All right. And before you got this job, was there
5 someone else who held that post?

6 A No.

7 Q So it was a job that was newly created when you
8 came on?

9 A It was newly created. Yes.

10 Q What do you do as Special Assistant and Records
11 Manager?

12 A I work directly for the Director of Oval Office
13 Operations and my daily functions include maintaining files
14 on records that come in to the Oval Office and also I create
15 summaries or chronicles of the day's schedule of what happens
16 with the presidency from day to day.

17 Q Who is the Director of Oval Office Operations?

18 A Nancy Hernreich.

19 Q All right. And she is your supervisor?

20 A Yes.

21 Q Has she been your supervisor since you came to the
22 White House?

23 A Yes.

24 Q The records that you keep, before you came to the
25 White House, do you know if anyone else kept those records?

1 Do you understand that?

2 A Yes.

3 Q Now, Ms. Wirth is going to be asking you the
4 questions this morning. If there are any questions that
5 are unclear, please ask her or anybody else who asks you a
6 question, because there may be a time when the grand jurors
7 will ask you questions, to restate the questions so that you
8 fully understand them.

9 A Yes.

10 Q And if you don't ask for a clarification, we'll
11 assume that you understand the question.

12 A Okay.

13 BY MS. WIRTH:

14 Q Ms. Kearney, can you tell us your age?

15 A I'm 44 years old.

16 Q And what is your occupation currently?

17 A I'm a Special Assistant to the President and
18 Records Manager.

19 Q And how long have you held that position?

20 A Since December of 1995.

21 Q And what did you do before that?

22 A I worked at the Small Business Administration.

23 Q And for how long did you do that?

24 A Roughly two and a half years.

25 Q Now, the position that you currently hold, what is

1 A No, I don't know.

2 Q Do you know whether the type of records that you
3 keep even existed before you came to the White House?

4 A No.

5 Q Have you ever seen any records like the ones you
6 keep that predate your time in the White House?

7 A Sure. The schedules and the different information
8 that I maintain, yes.

9 Q And do you know who kept those before you got
10 there?

11 A There was no one in this position that kept them,
12 but I don't know whether someone else did or not.

13 Q Okay. And when did you begin again? December '95,
14 you said?

15 A Yes.

16 Q Okay. Now, where do you physically sit? Where is
17 your work station in the White House?

18 A I'm in the West Wing, on the first floor.

19 Q Okay. And where do you sit in relation to where
20 Nancy Hernreich sits?

21 A I'm down the hall from Nancy Hernreich.

22 MS. WIRTH: Okay. I'm going to mark this map as
23 Grand Jury Exhibit JFK, for your initials, and this will be
24 Exhibit 32 because there are a number of other exhibits that
25 I'm going to show you that have already been marked.

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1 (Grand Jury Exhibit No. JFK-32
2 was marked for identification.)
3 BY MS. WIRTH:
4 Q I'm just going to ask you to look at this. It
5 purports to be a map of the West Wing.
6 A Mm-hmm.
7 Q And looking at that map, do you see on the map the
8 place where your work station or office is?
9 A I would guess this is the area that my office is,
10 right here.
11 Q Okay. If you would just take this green pen and
12 mark with your initials JFK where you sit.
13 Okay. And, for the record, you've marked a spot
14 that is to the left of the diagram, left center, underneath a
15 box marked lobby, correct?
16 A Yes.
17 Q Okay. And somewhat to the left of the Roosevelt
18 Room and somewhat to the right of Room 113.
19 A Yes.
20 Q Okay. Is that office all yours or do you share it
21 with anybody?
22 A I share it with other people.
23 Q Okay. Who else do you share it with?
24 A There's a secretary here, June Gayle Turner.
25 Q Who?

Page 14

1 A June Gayle Turner. I sit here. A staff assistant
2 sits here, Rebecca Cameron. And Kris Engskov sits here. And
3 also an intern sits kind of in between those two.
4 Q Okay. And has that always been your work station
5 since you've been at the White House?
6 A Yes.
7 Q Okay. By the way, what is your telephone extension
8 there?
9 A [REDACTED]
10 Q And have you held that number since you've been
11 there?
12 A Yes.
13 Q Okay. Can you -- before I ask you that question,
14 you said that Nancy Hernreich is your supervisor.
15 A Yes.
16 Q Is there anybody else besides yourself that
17 performs your duties?
18 A No.
19 Q Okay. All right. Tell the grand jury in as much
20 detail as you can what you do.
21 A I can tell you by telling you what I do going by
22 one day, this is what I do when I first come to work in the
23 morning.
24 I usually come to work around 7:30 in the morning
25 and at 7:45 there is a senior staff meeting that I attend.

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1 It's Erskine Bowles, who is the Chief of Staff, he holds a
2 senior staff meeting and I attend that meeting and I usually
3 record information from that meeting.
4 After that meeting, I may or may not attend
5 another meeting with Nancy Hernreich. Those meetings are
6 not regularly scheduled, but from time to time, she holds
7 meetings just of the Oval Office staff.
8 After that meeting, my day is completely dependent
9 on what the President's schedule has and I will attend events
10 or meetings or if he goes traveling, from time to time, I
11 will travel with the President and what I do is chronicle
12 what is happening during the day, events that take place,
13 announcements that he makes.
14 If he has meetings such as meetings with people
15 from outside, constituency meetings or cabinet meetings, I
16 will sit in on those meetings and record those meetings as
17 part of my job.
18 Q Now, are there times when for reasons that maybe
19 you can explain to us you don't always travel with the
20 President?
21 A Yes.
22 Q You always do travel with him?
23 A No, I don't.
24 Q There are times when you don't. When you don't
25 travel with him or if you don't go outside the White House,

Page 15

1 for example, if he goes to a meeting, say, in New York or on
2 the other side of town in Washington, if you don't travel
3 with him, who does your recording function while you're not
4 there?
5 A No one. No one does it. I utilize information
6 that is brought back from the trip to do my recording.
7 Q And who decides when you attend something and when
8 you don't?
9 A It's usually a judgment call between myself and
10 Nancy Hernreich.
11 Q Okay. And do you discuss that on a daily basis,
12 which events and things will you'll be attending, or not?
13 A Not on a daily basis. No.
14 Q Okay. But you generally have an idea, for example,
15 in any week what things you're going to and what things
16 you're not going to attend?
17 A On a day-to-day basis.
18 Q Now, the senior staff meeting that you told us, you
19 attend that every morning?
20 A Yes.
21 Q Those are Monday through Friday?
22 A Yes.
23 Q And Erskine Bowles runs those?
24 A Yes.
25 Q Okay. And who else attends those, just generally

Page 17

1 speaking?

2 A Senior staff. The deputy chief of staffs, the
3 communications advisors, the cabinet secretary, people who
4 are senior staff members.

5 Q Okay. Does Nancy Hernreich attend those meetings?

6 A Yes.

7 Q Does Betty Currie?

8 A No.

9 Q Does the President?

10 A No.

11 Q Now, you said that often you will also have a
12 meeting with Nancy Hernreich, not every day but --

13 A Sometimes.

14 Q Sometimes. And you said that those are Oval Office
15 meetings. Who attends those?

16 A Oval Office staff, who is made up of Betty Currie,
17 Kris Engskov, myself, Rebecca Cameron, and Nancy Hernreich.
18 Those are the immediate Oval Office staff.

19 A Yes.

20 Q Now, at the senior staff meetings, typically what
21 types of things are discussed?

22 A Basically things that are going on with the
23 President, what events are going to be held during the day
24 or sometimes they'll speak of what's happening the next day.
25 Each senior staff person will talk about their role in that

Page 18

1 or what their office is doing as far as the events.

2 Q And typically how long do those meetings last?

3 A Ten to fifteen minutes. Fifteen minutes usually.

4 Q Do you take handwritten notes?

5 A Yes.

6 Q And generally your meetings with Nancy Hernreich,
7 if they occur, how long do they last?

8 A Five to ten minutes.

9 Q And where do those take place?

10 A In the Betty Currie's area and I'm not sure of the
11 official name for it, but it's the area that Betty Currie
12 sits in and Nancy Hernreich sits in and Kris Engskov from
13 time to sits there.

14 Q And generally what is the subject matter of those
15 meetings?

16 A The President's day. The schedule. What things
17 specifically Kris and Betty would need to know because
18 they're more immediately involved in his schedule.

19 Q Now, when you discuss with Nancy Hernreich what
20 events you'll be attending, does that take place at those
21 meetings or privately between the two of you?

22 A Usually not. No.

23 Q Usually not at those meetings?

24 A No. It doesn't take place there.

25 Q So it's one on one between you and her?

Page 19

1 A Yes.

2 Q Okay. Now, you said that generally speaking you
3 attend these meetings, you follow the President around, you
4 keep a record of what's happening. What types of things do
5 you attend where the President is present on an average day?

6 Let's take an example where the events occur in the White
7 House. What types of things would you be present for?

8 A Cabinet meetings, when he has his cabinet heads
9 come in and he meets with them. Congressional meetings from
10 time to time, when congressional leaders come in and they're
11 talking about specific issues. Outreach meetings when
12 constituencies come in and talk about different issues.
13 Different policy meetings.

14 Q And when you take -- I take it you take notes of
15 those meetings?

16 A Yes.

17 Q And do you record who's present during those
18 meetings?

19 A Yes.

20 Q And --

21 A They're not word-for-word or every person, but --

22 Q Do you summarize what happens in the meetings in
23 your notes?

24 A Yes.

25 Q And when you travel with the President, whether

Page 20

1 it's in Washington or out of town, do you do essentially the
2 same thing?

3 A Yes.

4 Q Now, what do you do with the notes that you keep?

5 A I use them to input into my computer. I do a
6 summary of whatever event or meeting or whatever and input
7 that into the computer.

8 Q And do you do that on a daily basis?

9 A Yes, I do.

10 Q Do you generally do that the same day as the
11 meeting?

12 A I try very hard to do that on the same day.

13 Q And what happens to that summary? Where does it
14 go?

15 A The original?

16 Q We'll get to your notes in a moment, but the
17 summary that you input into the computer, for what purpose do
18 you do that? Where does that end up?

19 A It stays there.

20 Q In the computer?

21 A Yes.

22 Q Do you generate any record from that?

23 A No, I don't.

24 MS. WIRTH: I'm going to show you Grand Jury
25 Exhibit JFK-1, which consists of five pages, so it's marked

Page 21

1 JFK-1-1 through JFK-1-5.
 2 (Grand Jury Exhibit No. JFK-1
 3 was marked for identification.)
 4 BY MS. WIRTH:
 5 Q I'm just going to ask you to look at that and tell
 6 us whether that's something that you recognize. And you'll
 7 see that, for the record, it's marked redacted, which
 8 indicates that much of the writing on that has been taken
 9 out.
 10 A Yes. Yes, I do.
 11 Q You do recognize this?
 12 A Yes.
 13 Q What is this?
 14 A That's input into a computer. That's a summary of
 15 the day.
 16 Q Okay. So this is what you're talking about when
 17 you say that you go into your computer and you try to do it
 18 on the same day.
 19 A Yes.
 20 Q You put in a summary of everything that's gone on
 21 that day.
 22 A Yes.
 23 Q So you just keep this in the computer, you don't
 24 generate a document that you pass around from your records?
 25 A No. No.

Page 22

1 Q All right. Okay. So this is a typical example of
 2 what you would do at the end of the day after following the
 3 President around and attending whatever meetings he had.
 4 A Yes.
 5 Q Do you use only your own notes and your own
 6 personal experience in creating this record or do you
 7 sometimes use information that you get from other people?
 8 A I use also information from other people.
 9 Q And can you tell the grand jury what kinds of
 10 things you would typically get from other people to complete
 11 your record?
 12 A Yes. I use things such as the President's
 13 schedule, which is generated on a daily basis; a briefing
 14 addendum that comes with the schedule that gives an overview
 15 of what each event is and sometimes tells why he's doing
 16 certain things and who's going to be involved in the events.
 17 I use annotated schedules that Kris Engskov does, his
 18 personal aide who travels with him, and if the schedule
 19 deviates at any time he will note that on his schedule. I
 20 use those also in my records.
 21 Q Okay. Now, you mentioned a presidential schedule.
 22 Is that generated on a daily basis?
 23 A Yes.
 24 Q Is that Monday through Sunday or Monday through
 25 Friday?

Page 23

1 A Monday through Sunday.
 2 Q Okay. And who generates that? Who creates that?
 3 A That comes out of the scheduling office. The
 4 President's scheduling office.
 5 Q And do you know who runs that office?
 6 A Stephanie Streett.
 7 Q And does she create this document herself or do you
 8 know if someone else does?
 9 A I do not know.
 10 Q Is she also in the West Wing?
 11 A I think so.
 12 Q Now, you also mentioned an annotated schedule that
 13 Kris Engskov annotates. And he's currently -- what is his
 14 title currently?
 15 A Personal Aide to the President.
 16 Q And is that the same presidential schedule and he
 17 just annotates it --
 18 A Yes.
 19 Q -- or is it a different schedule?
 20 A No, it's the same schedule.
 21 Q The presidential schedule that you mentioned, who
 22 is that circulated to on a daily basis, if anyone?
 23 A The senior staff is the only people that I know.
 24 Other than that, I don't know.
 25 Q And what types of things are noted on the

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1 presidential schedule?
 2 A What events he's going to be doing for the day.
 3 What times. What types of meetings. Basically.
 4 Q And if he has office time or down time, I don't
 5 know what it would be called, what would it be called on the
 6 schedule if it's not --
 7 A Both of those. Office or down time.
 8 Q Okay. And do those mean the same thing?
 9 A They can. I think office time means he's going to
 10 be in his office. Down time, he could be in his office
 11 during down time.
 12 Q Or he could be just resting or somewhere else?
 13 A Yes.
 14 Q Okay. If the President were going to be engaged
 15 in something personal like a haircut or a meeting with his
 16 lawyer, would those things be noted on the presidential
 17 schedule?
 18 A They may or may not be. I can't remember for sure
 19 whether they would be or not.
 20 Q Do you know if there's another schedule besides the
 21 presidential schedule that's widely circulated as you've
 22 discussed, whether there's another schedule that contains --
 23 you know, more personal, mundane matters like a haircut or a
 24 meeting with a lawyer?
 25 A The only other document that I know of would be the

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1 ushers' log.
 2 Q What is that?
 3 A That's a log that's generated out of the residence.
 4 Q And what types of things are kept in that log?
 5 What kinds of information?
 6 A A haircut. I mean, if he got a haircut, that would
 7 be in there.
 8 A JUROR: Excuse me. You have to speak up.
 9 MS. WIRTH: Sure. We'll try.
 10 THE WITNESS: I'm sorry. My throat is kind of
 11 sore.
 12 BY MS. WIRTH:
 13 Q Do you need some water or anything?
 14 A No. No.
 15 Q If you do, just let us know and we can step
 16 outside.
 17 A I just said that a haircut would likely be on the
 18 ushers' log.
 19 Q What about things like a visit from a friend? You
 20 know, whether that visit is prearranged or just a drop-in
 21 visit. Would that type of thing be noted on the President's
 22 schedule?
 23 A It could very well be. Yes.
 24 Q Have you seen the ushers' logs?
 25 A Yes.

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1 Q Okay. Would that type of thing also be on the
 2 ushers' log?
 3 A Yes. It could be.
 4 Q Would it only be on the ushers' log if it was a
 5 visit in the residence?
 6 A I would have to guess on that because I'm not sure.
 7 Q What would be your educated guess? And we'll take
 8 it with the understanding that it's a guess.
 9 A I don't know. I really would rather not guess,
 10 but I -- I think the residence visits are on the ushers' log.
 11 Q Okay. But you don't -- and, again, if you don't
 12 know, just tell me, but if someone dropped in at the Oval
 13 Office, would that be on the ushers' log? Or you don't know
 14 or no?
 15 A I don't know.
 16 Q Okay. And I take it there are ushers, people whose
 17 title is usher, who keep this log? Is that true?
 18 A Yes.
 19 Q Where do they generally work? What's their work
 20 station?
 21 A The residence is all -- I know they're in the
 22 residence area.
 23 Q And they're not Secret Service people.
 24 A I don't know that.
 25 Q Now, getting back to the President's schedule, you

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1 said a moment ago that a personal visit might be noted on the
 2 schedule, correct?
 3 A It could be.
 4 Q Do you know under what circumstances it would be
 5 and what circumstances it would not be?
 6 A No.
 7 Q Do you know whether it would only be on the
 8 schedule if it was a prearranged visit?
 9 A No, I don't know.
 10 Q You examine the annotated schedules, you told us,
 11 correct?
 12 A I review them. Yes.
 13 Q Do you get those every day?
 14 A No, not every day.
 15 Q When do you get them?
 16 A I get them during the week. I may get them twice
 17 during the week.
 18 Q Do you decide when you get them?
 19 A No, I get them from Kris Engskov.
 20 Q And what dictates whether you get a copy of the
 21 annotated schedule?
 22 A I think he decides each day and when he's finished
 23 one or two days, he'll give them to me.
 24 Q But do you basically get every day? Not on each
 25 day, but do you get a full week's schedule at some point, an

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1 annotated schedule?
 2 A I have every day that Kris has done.
 3 Q Does he do it every day?
 4 A He does every day, but sometimes on weekends, there
 5 won't be an annotated schedule.
 6 Q Okay. So at some point, you get the annotated
 7 schedule for each week, meaning the business days, Monday
 8 through Friday.
 9 A Yes. Yes.
 10 Q On his annotated schedule, would he typically note
 11 personal visits?
 12 A I have seen personal visits on his annotated
 13 schedule.
 14 Q Do you know if every personal visit is noted on the
 15 annotated schedule?
 16 A No, I do not know that.
 17 Q Now, let's talk about telephone calls. On the
 18 President's schedule, the one that's circulated, not the
 19 annotated one, are telephone calls noted on that?
 20 A Sometimes they are. Yes.
 21 Q And that schedule is created before the day even
 22 begins, correct?
 23 A Yes.
 24 Q So if telephone calls are on that schedule, is it
 25 because they're anticipated or because they're placed there

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1 after they occur?

2 A They're anticipated.

3 Q And the phone calls that you've seen on the
4 President's schedule, are they of an official nature?

5 A Yes.

6 Q Are they sometimes personal?

7 A No. None that I can recall.

8 Q Now, on the annotated schedule that Kris Engskov
9 gives you, does he note phone calls there as well?

10 A I'd have to guess, really. I can't recall whether
11 he does or not.

12 Q Now, the record that you have in front of you which
13 is Grand Jury Exhibit JFK-1, I'm going to ask you some
14 questions about that. And, as we've noted for the record,
15 it's been highly redacted, but let's look for a moment at the
16 last two pages, which I think is JFK-1-4 and 5, okay?

17 A Yes.

18 Q Let's look at 5 for a moment. At the top of the
19 page, it says "The President spoke to" and then there are a
20 number of times listed, okay? Starting with -- it looks like
21 6:17 a.m., is that right? 8:31 a.m.

22 A I'm not sure.

23 Q A little hard to read.

24 A Mm-hmm.

25 Q But for the record, it looks like 6:17 a.m.,

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1 8:31 a.m., what may be 10:38 a.m., 1:26 p.m., 2:06 p.m.,
2 7:29 p.m. and 7:07 p.m. Does that look right? As best we
3 can read?

4 A As best, yes.

5 Q Okay. Does this portion of the record that you
6 keep refer to personal conversations in person or telephone
7 conversations or both?

8 A Those are telephone conversations.

9 Q Okay. And sometimes you write in there the
10 President spoke on the phone, correct?

11 A Yes.

12 Q And sometimes you don't.

13 A Yes.

14 Q Okay. But this portion refers strictly to
15 telephone calls.

16 A Yes.

17 Q All right. And where do you get the information
18 that you put in this portion of the record that you keep?
19 The specific times. I'm sorry.

20 A Yes. Yes. Those come from the telephone logs.
21 The presidential telephone logs.

22 Q And who do you get those from?

23 A Those come from Nancy Hernreich's office.

24 Q And do you get those on a daily basis?

25 A Yes.

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1 Q And the times that you've noted there, are those
2 the times when the telephone call began?

3 A Yes. To the best of my knowledge, yes.

4 Q Okay. And you don't note duration of the call on
5 your record.

6 A No.

7 Q And where information has been redacted, would that
8 be where the names of the people with whom the President
9 spoke are recorded on your record?

10 A I would guess so. Yes. I do record the names of
11 people whom he spoke with.

12 Q You do this every day, right?

13 A Yes.

14 Q And typically you would say something like the
15 President spoke to Jane Doe, 6:17 a.m., or John Smith,
16 whatever?

17 A Yes. Yes.

18 Q Okay. And all of that information comes off the
19 telephone logs that you just told us about.

20 A Yes.

21 Q Now, do you record each and every phone call from
22 the phone logs that you receive?

23 A I'm not sure that I do, but usually what I do is go
24 down the phone log and list names, but I can't guarantee you
25 that I put everybody's name down there every time.

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1 Q Well, what is your goal? Are you trying to make a
2 complete record of every phone call he made that day that's
3 recorded in the logs?

4 A Yes. I guess the only time that I would probably
5 not, if he's talking to an usher and it's in the residence
6 or -- you know, something like that.

7 Q And you could get a phone log for a call like that.

8 A Pardon?

9 Q You could receive a phone log that would record a
10 call between the President and an usher?

11 A Yes. The log would have any call, so it would also
12 include a call to an usher or to a steward or whatever.

13 Q Who crates the telephone log?

14 A I do not know.

15 Q Is it in handwriting when you get it or typed?

16 A It's typed.

17 Q Do you know who types it?

18 A No.

19 Q Do you know whether the telephone logs are intended
20 to record every telephone conversation that the President is
21 involved in every day, whether he made or received the phone
22 call?

23 A I do not know.

24 Q Do you know who would know?

25 A No.

1 Q The names that you typically record on this
2 document in this portion relating to the phone records, can
3 you tell us whether those names are both of a business nature
4 and a personal nature?

5 Do you know whether sometimes you record the names
6 of friends there in addition to names of people with official
7 business?

8 A I'm sure I do.

9 Q Okay. So are you sure you do include the names of
10 friends?

11 A Yes.

12 Q And every time that you see a friend's name on
13 a phone log, do you include that friend's name in your
14 record?

15 A Yes. I mean, I'm sure I do. The only time that
16 I would not include a name would be like I said, if it's like
17 him talking to a military aide or steward which has no
18 historical purpose.

19 Q Do you have any idea whatsoever whether the phone
20 logs that you receive are a complete record of every phone
21 call that the President was involved in on any given day?

22 A I have no knowledge of that. No.

23 Q Have you ever had any discussions with anybody
24 about whether that's a complete -- whether the logs are a
25 complete record of the phone calls that he's been engaged in

1 Q No?

2 A No.

3 Q Does anybody read this?

4 A No.

5 Q It's just a running --

6 A Yes.

7 Q Can you tell the grand jury what the purpose of
8 your keeping this is? Was it ever conveyed to you as part of
9 your instructions or your duties why you're doing this?

10 A Yes. This is for archival purposes. This is a
11 historical chronicle of the presidency that will be used at
12 the end of his presidency for whatever purposes, historical
13 purposes, archival purposes.

14 Q Meaning the National Archives or his own
15 presidential records?

16 A His presidential records. Yes.

17 Q And to your knowledge, and I know I've asked this
18 before, but let me try one more time. To your knowledge,
19 was any effort made before you got there to keep some sort of
20 record like this for his presidential records?

21 A Not to my knowledge.

22 Q Okay. But the records that you use in this
23 document, those preexisted your tenure in the White House.

24 A Yes.

25 Q So this is just an attempt to put them all together

1 either receiving or making every day?

2 A No. Not that I can recall.

3 Q Anybody ever asked you that question before?

4 A The only time that I have been asked that question
5 was from the President's diarist, Ellen McCathran, who keeps
6 all of his logs, and she may have asked me to ask someone in
7 the office if there was a call that was made or not made or
8 whatever that wasn't on there.

9 Q When did she ask you that?

10 A Oh, I don't remember, but I think I recall her
11 asking because she keeps track of all of this.

12 Q Was she asking you the question that I asked you,
13 which is is this everything, every call that he's made or
14 received that day?

15 A No, I don't think it was even that. I think it was
16 maybe there was a phone call on there and she didn't know who
17 it was and she would ask if Nancy knew or Betty knew who this
18 person was so that she could record it as diarist.

19 Q Okay. When you say "on there," you mean on the
20 record that you create?

21 A Not on my record. No. On the phone log.

22 Q Okay. So what, is this a situation where -- I
23 mean, does Ellen McCathran receive a copy of this document
24 that you create?

25 A No.

1 in some fashion.

2 A Yes.

3 Q All right. Now, you mentioned a few minutes ago
4 that you sometimes record personal visits in your record, in
5 this document that you generate, correct?

6 A If it's on some of the documents that I get, I put
7 it into the computer. Yes.

8 Q Okay. So if you saw a personal visit recorded in
9 the presidential schedule or the annotated schedule, you
10 would record it automatically here in the document that you
11 create? Or do you use some judgment as to --

12 A I use some judgment. I mean, if it's historically
13 interesting or it would serve some purpose historically, I
14 would put it into the computer.

15 Q Okay. All right. But with respect to calls other
16 than the usher, military type thing, do you exercise any
17 judgment there as to which to record or do you record them
18 all?

19 A As far as I can remember, I record them all. Yes.

20 Q When you receive telephone logs, do you sometimes
21 see telephone calls between the President and any of his
22 lawyers? For example, like David Kendall or Robert Bennett?

23 A Yes.

24 Q And are those recorded in this document as well?

25 A Yes.

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1 Q Are you familiar with the name Vernon Jordan?
 2 A Yes.
 3 Q Have you ever seen his name on any of the telephone
 4 records that you record?
 5 A Yes.
 6 Q Are you familiar with the name Monica Lewinsky?
 7 A Yes.
 8 Q Have you ever seen her name on any of the telephone
 9 records-that you record?
 10 A No.
 11 Q Have you ever seen her name on any of the visits
 12 that you've recorded in the records?
 13 A No.
 14 Q Have you done any kind of search to see whether her
 15 name appears anywhere in your records?
 16 A Yes.
 17 Q Can you tell the grand jury what you did?
 18 A I searched my computer. When I got the request
 19 from the counsellor's office to search, I did and I found
 20 nothing. I found no indication that her name had been input
 21 anywhere.
 22 Q Okay. And your search covered all of your records
 23 since you began keeping them?
 24 A Yes.
 25 Q Okay. And similarly, if the President's lawyers

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1 were to visit him and that's recorded on the schedule, would
 2 that also be something that you would record in your document
 3 that you keep? Have you done that on occasion?
 4 A I have.
 5 Q And when there is a visit from his lawyers noted
 6 in his schedule, whether it's the presidential schedule or
 7 the annotated schedule, would you always include that or,
 8 again, do you exercise some judgment on whether you include
 9 that?
 10 A I wouldn't -- I can't think of any reason why I
 11 wouldn't include that. I would include that.
 12 Q Okay. And have you ever received any instructions
 13 on that issue at all?
 14 A No.
 15 Q As to whether you should include that or not?
 16 A No.
 17 Q And returning again to the subject of Vernon
 18 Jordan, to your memory, have you ever included a visit from
 19 him in the record that you keep?
 20 A Yes.
 21 Q Okay. Let's just turn to the first page of this
 22 document, JFK-1, and if you could just walk the grand jury
 23 through what these different categories are. It begins with
 24 senior staff meeting and that's Mr. Bowles' meeting that you
 25 referred to earlier?

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1 A Yes.
 2 Q Okay. And on this day, Friday, June 7, 1996, it
 3 notes "Day off for the President except for 9:30 meeting he
 4 agreed to." Is that correct?
 5 A Yes.
 6 Q And then you have a category entitled "Economic
 7 News." Does this refer to something that's discussed at the
 8 meeting?
 9 A Yes.
 10 Q Okay. And is that typically just like media type
 11 news or some internal information or both?
 12 A Both. Yes.
 13 Q And is the same true for National Security Council?
 14 A Yes.
 15 Q Are these categories repeated day after day,
 16 generally?
 17 A Yes. Generally, they are.
 18 Q And Legal. What would that refer to? Is that the
 19 White House Counsel's Office?
 20 A Yes.
 21 Q Okay. Do they attend this meeting in the morning
 22 as well?
 23 A Yes.
 24 Q Does Mr. Ruff attend?
 25 A Yes. Usually.

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1 Q And then the next page, Political?
 2 A Yes. That's the political office.
 3 Q Okay. And Cabinet Affairs?
 4 A Yes.
 5 Q Who reports there?
 6 A The head of the cabinet affairs.
 7 Q And the next page, it says "Today's News." Is that
 8 kind of a summary of media news?
 9 A Exactly.
 10 Q Who provides that?
 11 A That comes from the clips. We have clips every
 12 morning, so basically I go through there.
 13 Q So this is not necessarily something that's
 14 discussed at the meeting.
 15 A Oh, no.
 16 Q The clips are handed out to everybody.
 17 A Exactly.
 18 Q All right. So it's just what's going on in the
 19 world on this particular day.
 20 A Yes.
 21 Q Okay. All right. Now, I just want to backtrack
 22 for a moment. When you started this job, who explained y
 23 duties to you?
 24 A Nancy Hernreich.
 25 Q And do you remember what she told you? As best as

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<p>1 you can remember. Generally speaking.</p> <p>2 A Basically, that it's a new position, but one that</p> <p>3 she felt was very important. And she had spoken with several</p> <p>4 historians and people from the Archives who felt that one of</p> <p>5 the things that was always missing from the president's</p> <p>6 office was someone who chronicled what happened from day to</p> <p>7 day. And that kind of was the decision to bring me in and do</p> <p>8 that.</p> <p>9 Q Okay. And did she give you any parameters as to</p> <p>10 what she thought should be in the record that you keep?</p> <p>11 A She really didn't. Basically, I understood that</p> <p>12 she was interested in me keeping a chronicle of what happened</p> <p>13 from day to day as far as his policy issues, the types of</p> <p>14 innovations that were being put in place by him, just his</p> <p>15 presidency, and it was pretty general.</p> <p>16 Q Did she give you any guidance whatsoever about what</p> <p>17 types of personal information should be included in the</p> <p>18 schedule? Referring again to either meetings or telephone</p> <p>19 calls, things of that nature.</p> <p>20 A No, she did not.</p> <p>21 Q Has she ever?</p> <p>22 A No.</p> <p>23 Q Have you had any discussions with anybody other</p> <p>24 than Ms. Hernreich about what should go in this record?</p> <p>25 A No.</p>	<p>1 Q Have you ever printed this out other than for</p> <p>2 discovery requests?</p> <p>3 A No. No.</p> <p>4 Q Does anyone edit what you input?</p> <p>5 A No.</p> <p>6 Q Does anyone look at it?</p> <p>7 A I think Nancy has looked at it once or twice, but</p> <p>8 not on a regular basis, no.</p> <p>9 Q When she looked at it, did she give you any</p> <p>10 suggestions or give you any input?</p> <p>11 A She told me she thought it was good. She liked</p> <p>12 what I was doing.</p> <p>13 Q I'm just going to take you through the records that</p> <p>14 were provided to us from your recordkeeping one by one and</p> <p>15 just have you identify them and sometimes I'll have some</p> <p>16 questions for you about them.</p> <p>17 A Okay.</p> <p>18 MS. WIRTH: So maybe you can put that one aside and</p> <p>19 we'll turn now to JFK-2, which is a document, a one-page</p> <p>20 document.</p> <p>21 (Grand Jury Exhibit No. JFK-2</p> <p>22 was marked for identification.)</p> <p>23 BY MS. WIRTH:</p> <p>24 Q Again, it's marked redacted and it's dated</p> <p>25 Thursday, August 29, 1996, and it basically contains one</p>
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<p>1 Q Now, for the record, tell us what documents you</p> <p>2 receive that help you generate this record. I believe you</p> <p>3 mentioned the presidential schedule, the annotated schedule,</p> <p>4 news clips.</p> <p>5 A Right.</p> <p>6 Q What else, if anything?</p> <p>7 A We talked about the telephone logs.</p> <p>8 Q That's right.</p> <p>9 A The presidential phone logs and the ushers' logs.</p> <p>10 Q Okay.</p> <p>11 A And just briefing material that comes through the</p> <p>12 White House on different issues and different policies that</p> <p>13 he's working on.</p> <p>14 Q And for each of those records, when do you</p> <p>15 generally get them?</p> <p>16 A There's no specific time. At the end of the day,</p> <p>17 I may get them. The schedule, of course, I get in the</p> <p>18 morning, but the rest of the information I may get at the</p> <p>19 end of the day or the next morning.</p> <p>20 Q Okay. And you told us that you generally tried to</p> <p>21 do this at the conclusion of every day?</p> <p>22 A Yes.</p> <p>23 Q How current are you right now?</p> <p>24 A I'm up to today. From time to time, I go back and</p> <p>25 input.</p>	<p>1 category of entry with respect to -- is this telephone calls</p> <p>2 again?</p> <p>3 A Yes.</p> <p>4 Q That the President either made or received. And</p> <p>5 there are five times listed there, correct?</p> <p>6 A Yes.</p> <p>7 Q Okay. Do you put those phone calls in any</p> <p>8 particular order, either chronologically -- sometimes are</p> <p>9 they out of order? Are they in order of importance? Or</p> <p>10 just as they come to you, you just feed them into the</p> <p>11 computer?</p> <p>12 A I think I just feed them into the computer.</p> <p>13 I see that's out of order, but I have no idea why it's</p> <p>14 like that.</p> <p>15 Q Okay. There's a call, for example, here noted</p> <p>16 12:06 a.m. The logs that you receive, the telephone logs</p> <p>17 that you receive, do they note whether a phone call is made</p> <p>18 from the Oval Office, from the residence, or from somewhere</p> <p>19 else? Does the log tell you where the phone call was made</p> <p>20 from or received?</p> <p>21 A No.</p> <p>22 Q So the log could refer to -- do you know whether</p> <p>23 the log records phone calls made from the residence?</p> <p>24 A I don't know. I don't know. I could say I guess,</p> <p>25 but I don't know.</p>

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1 Q Okay. But sometimes you see phone calls made in
2 the early morning hours, correct?
3 A Yes.
4 Q Okay. And you just don't know where a particular
5 phone call was made from or received.
6 A No, I don't.
7 MS. WIRTH: Okay. All right. Let's look at JFK-3,
8 which is a five page document marked JFK-3-1 through 5.
9 (Grand Jury Exhibit No. JFK-3
10 was marked for identification.)
11 BY MS. WIRTH:
12 Q Okay. This one starts with senior staff meeting
13 Leon. Is that Mr. Panetta?
14 A Yes.
15 Q And it says "The President's schedule today is
16 down."
17 A Yes.
18 Q And you talked about that earlier. That means he's
19 basically on his own time?
20 A No public events.
21 Q Okay. So it could mean he's in the office or it
22 could be that he's engaged in personal time.
23 A Yes.
24 Q All right. Now, on the second page of that
25 document, there are some names mentioned in addition to the

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1 usual categories, Legislative, Cabinet Affairs. We see Rahm.
2 That's Mr. Emanuel?
3 A Yes.
4 Q Would that note something that he talked about at
5 the senior staff meeting?
6 A Yes.
7 Q And the same for Jodie? Is that Ms. Torkelson?
8 A Yes.
9 Q And beneath that, Mack. Is that Mr. McLarty?
10 A Yes.
11 Q And Mr. Curry?
12 A Yes.
13 Q All of those indicate matters that were discussed
14 by those individuals at the meeting?
15 A Yes.
16 Q OVP is Office of Vice President?
17 A Yes.
18 Q All right. Now, these are not personal meetings
19 conducted with these people, these are matters that were
20 raised by these people at the morning meeting?
21 A Exactly.
22 Q Let's look at the next to the last page, I think
23 that's page 4. Is that right?
24 A Yes.
25 Q Where it says "Day Notes." What are day notes?.

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1 A Day notes may be non-official notes, just something
2 that have nothing to do with his schedule or events or
3 whatever.
4 Q Can you give us just like a general example of what
5 would be in there?
6 A Something that might be in there is that Chelsea
7 came by to see her father and they may have talked.
8 Q Okay. Now, are other family, relatives, friends
9 noted in day notes as well?
10 A From time to time. Maybe.
11 Q Is that your discretion?
12 A Yes.
13 Q And if Chelsea came by to see her father, where
14 would that be recorded? How would you know that? How would
15 you know to put that in there?
16 A It could have been on the ushers' log or it could
17 have been I was around when she walked in.
18 Q Okay. All right. And, again, on page 5, that last
19 category, here we say "President talked via telephone."
20 A Yes.
21 Q And just so the record is absolutely clear on this,
22 this category is always telephone calls.
23 A Yes, it is.
24 Q Whether you say that or not.
25 A Yes, it is.

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1 MS. WIRTH: Okay. Let's look at JFK-4, which is an
2 eight-page document marked JFK-4-1 through JFK-4-8.
3 (Grand Jury Exhibit No. JFK-4
4 was marked for identification.)
5 BY MS. WIRTH:
6 Q And this is Thursday, October 24, 1996, is that
7 right?
8 A Yes.
9 Q And, again, Mr. Panetta is still the Chief of Staff
10 at that time because it says senior staff meeting his name,
11 Leon, is noted there, correct?
12 A Yes.
13 Q Okay. On page 2, who is Gene?
14 A Gene Sperling.
15 Q And what was his job?
16 A National Economic Council.
17 Q Now, the next page -- I'm sorry, could I look at
18 that just for a minute?
19 A This one?
20 Q No, no. The whole thing. I just want to see
21 what I did here. I gave you too much. I made a mistake.
22 All right.
23 Actually, JFK-4-1 through 3 is Thursday, October
24 24th, just check me on that.
25 A Mm-hmm. Okay.

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1 Q And JFK-4-4 through 4-8 is actually another day.
 2 A Okay.
 3 Q Thursday, December 17th. Is that right?
 4 A Yes.
 5 Q Okay. So that Exhibit 4 will encompass two days,
 6 then. All right. So the last page then, page 4-3, those are
 7 the telephone calls?
 8 A Yes.
 9 Q Okay. Now, there's one there that's noted that's a
 10 conference call?
 11 A Yes.
 12 Q Would you list all the participants in the
 13 conference call?
 14 A Yes. Usually.
 15 Q And you would get that from a phone log?
 16 A Yes.
 17 Q Okay.
 18 A And let me back up.
 19 Q Sure.
 20 A I wouldn't list everyone in the conference call
 21 because most of the people on the conference call would be
 22 just staff.
 23 Q I see.
 24 A But I would list the principals.
 25 Q Okay. And that's, again, a judgment thing based

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1 on --
 2 A Yes.
 3 Q Would the phone log record every single person that
 4 was on the conference call?
 5 A Yes.
 6 Q All right. Okay. Then let's look at page 4-4,
 7 which is a new day, Tuesday, December 17, 1996. It's again a
 8 Mr. Panetta day, right?
 9 A Yes.
 10 Q And if you look at the third page of that document,
 11 which I guess is 6, 4-6?
 12 A Yes.
 13 Q Towards the bottom, we have "The President held a
 14 foreign policy team meeting in the Oval at 10:30" and then
 15 there's another item below, "Prime Minister John Bruton of
 16 Ireland at 10 a.m." When would you record the actual time of
 17 meetings and when would you not?
 18 A At the end of the day, usually, I would record the
 19 time of the meeting.
 20 Q Okay. But as we go through these documents, some
 21 of them have the times of specific meetings and some don't.
 22 A Mm-hmm.
 23 Q When do you put the specific times?
 24 A Usually if the annotated schedule has a specific
 25 time, I will put that on. If it doesn't, I'll leave an about

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1 time on there.
 2 Q Okay. And then the last two pages of that
 3 document, which would be 7 and 8 --
 4 A Mm-hmm.
 5 Q It says "President spent about an hour taking White
 6 House office photos with staff." Would then be listed
 7 underneath the names of people whose photographs were taken
 8 with him? Do you know?
 9 A I do not know what would be under that.
 10 Q Okay. And the last page, actually running over
 11 from 7 to 8, "The President talked via phone," those are the
 12 phone calls.
 13 A Mm-hmm.
 14 THE FOREPERSON: Ms. Wirth?
 15 MS. WIRTH: A break?
 16 THE FOREPERSON: It's time for a break.
 17 MS. WIRTH: Okay. That's fine.
 18 So we'll take -- how long of a break?
 19 THE FOREPERSON: Fifteen minutes.
 20 MS. WIRTH: Okay. Then returning about --
 21 THE FOREPERSON: At a quarter 'til.
 22 MS. WIRTH: Yes. About a quarter to or a minute
 23 after that.
 24 Thank you. You can step outside.
 25 (Witness excused. Witness recalled.)

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1 BY MS. WIRTH:
 2 Q Ms. Kearney, just a couple of follow-up questions
 3 to things that we discussed earlier. The ushers --
 4 THE FOREPERSON: I'm sorry.
 5 MS. WIRTH: Yes?
 6 THE FOREPERSON: I'm sorry, I forgot to remind you
 7 that you are still under oath.
 8 THE WITNESS: Thank you.
 9 MS. WIRTH: Thank you.
 10 And we have a quorum?
 11 THE FOREPERSON: Yes, we do.
 12 MS. WIRTH: And there are no unauthorized persons
 13 present in the grand jury?
 14 THE FOREPERSON: No, there are not.
 15 MS. WIRTH: Thank you.
 16 BY MS. WIRTH:
 17 Q Anyway, a follow-up question. On the ushers' log
 18 that you talked about?
 19 A Yes.
 20 Q Does the ushers' log contain telephone calls, to
 21 your knowledge?
 22 A To my knowledge, no.
 23 Q What kinds of things does it contain?
 24 A People's names are on them.
 25 Q Visitors?

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1 A Visitors. Times. And basically, that's it.
 2 Q Do you know if the President were to make a call
 3 from the residence or receive a call at the residence where
 4 that would be recorded?
 5 A No.
 6 Q It could be recorded on the phone logs that you
 7 receive --
 8 A They could be.
 9 Q --but you just don't know?
 10 A Right.
 11 Q And all the phone calls that you record come off
 12 the phone log?
 13 A Yes.
 14 Q Okay. Did you ever see Monica Lewinsky's name on
 15 any of the records that you received that you used to input
 16 into your record that you create?
 17 A No.
 18 Q Did you receive any instructions at any time with
 19 respect to what has historic value?
 20 A No. I mean, except for just discussion on what
 21 historians have talked to Nancy about or people from the
 22 Archives office have talked to Nancy about.
 23 Q Okay. And generally what would that be?
 24 A That would be general. Basically, things that
 25 would be of interest to people who are writing about the

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1 presidency, about this president; historians who are
 2 interested in what happens from day to day during a
 3 president's tenure.
 4 Q I'm sorry, tenure?
 5 A Tenure. Yes.
 6 Q Okay. In your work, you have seen evidence, have
 7 you not, of either late night or early morning telephone
 8 calls? Telephone calls, for example, between midnight and
 9 six a.m.?
 10 A Could you repeat that?
 11 Q You have seen evidence in the work that you do of
 12 telephone calls either made by the President or received
 13 between midnight and six a.m.
 14 A Sure. On the logs.
 15 MS. WIRTH: Okay. Now, I'm going to show you three
 16 additional documents that I will mark as JFK-33, JFK-34 and
 17 JFK-35.
 18 (Grand Jury Exhibits Nos. JFK-33,
 19 JFK-34 and JFK-35 were marked for
 20 identification.)
 21 BY MS. WIRTH:
 22 Q The first one is entitled "Presidential Call Log"
 23 and it's dated December 15, 1997. Is that right?
 24 A Yes.
 25 Q Okay. And do you recognize that type of document?

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1 A Yes.
 2 Q And this particular one records a call from Betty
 3 Currie to the President? Is that correct?
 4 A I can't tell.
 5 Q Okay.
 6 A I know it's Betty Currie and Betty Currie talked to
 7 the President, but I can't tell you whether she called him or
 8 he called her.
 9 Q Okay. In the left-hand column, where it says out
 10 and incoming --
 11 A Mm-hmm.
 12 Q I-N-C, does that stand for incoming?
 13 A Incoming. Yes, I would think so.
 14 Q Okay. So does that mean that the call came into
 15 the White House?
 16 A Again, I would guess so, but I really don't know.
 17 Q Okay. But is this the kind of log that you work
 18 with?
 19 A Yes, it is.
 20 Q So you don't record for your purposes who made the
 21 call, so you don't necessarily --
 22 A No. No.
 23 Q -- concern yourself with that.
 24 A I don't. The only thing I'm concerned with is with
 25 whom he talks and I put the names the time, that's all I put.

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1 Q Okay. And if you saw, you know, that Betty Currie
 2 had called the President, you know, from reviewing phone
 3 logs, would you include that in your summary at the end of
 4 each daily document where you record phone calls?
 5 A I would record that. If Betty Currie's name was on
 6 this document, I would record it.
 7 Q This document is also marked redacted, correct?
 8 A Yes.
 9 Q Okay. And I'm going to show you JFK-34, which is a
 10 grand jury exhibit, dated January 9, 1998.
 11 A Yes.
 12 Q And it's entitled "Presidential Call Log Signal
 13 Switchboard." Do you know what this is?
 14 A I do know. It's a call log and it has two phone
 15 calls on it.
 16 Q Is this also a type of document that you use in
 17 creating your record?
 18 A Yes. Yes.
 19 Q Do you know the difference between Grand Jury
 20 Exhibit 33 and 34 in terms of who keeps this record?
 21 A No, I don't. I don't.
 22 Q Okay. But you use them both.
 23 A I do.
 24 Q And, again, if you received JFK-34 entitled
 25 "Presidential Call Log," this reflects two phone calls with

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1 Betty Currie's name on them, correct?
 2 A Yes.
 3 Q Either made by or to Betty Currie from the
 4 President.
 5 A Right.
 6 Q If you received this document and saw Betty
 7 Currie's name recorded there as someone who spoke to the
 8 President on the telephone on that day on two occasions,
 9 would you record that in your record?
 10 A Yes.
 11 Q All right. And, finally, Grand Jury Exhibit
 12 JFK-35, which is dated June 14, 1996 and is also marked
 13 redacted. Do you recognize this document?
 14 A No.
 15 Q It is dated June 14, 1996. Is that correct?
 16 A Yes, it is.
 17 Q Have you ever seen a document like that before?
 18 A No.
 19 Q This document appears to contain times and
 20 references like "The President talked with" and then blank,
 21 "The President talked with" blank, "The President telephoned"
 22 blank, "The President was telephoned by" blank. Is that
 23 accurate?
 24 A Yes.
 25 Q Okay. And there are times associated with each of

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1 those events. You have not seen this type of document in
 2 your work?
 3 A I don't recall ever seeing this document.
 4 MS. WIRTH: Okay. All right. Okay. Let's pick up
 5 with JFK-5, Grand Jury Exhibit JFK-5, which is a one page
 6 document and it's dated Monday, December 30, 1996.
 7 (Grand Jury Exhibit No. JFK5
 8 was marked for identification.)
 9 BY MS. WIRTH:
 10 Q Is that right?
 11 A Yes.
 12 Q It is also marked redacted on the bottom?
 13 A Yes.
 14 Q And it also contains the category of phone calls,
 15 correct?
 16 A Yes.
 17 Q Again, with the names of any persons the President
 18 talked to taken out, is that correct?
 19 A Yes.
 20 MS. WIRTH: Okay. Okay. Let's go, then, to JFK-6,
 21 which is a six-page document, JFK-6-1 through 6.
 22 (Grand Jury Exhibit No. JFK6
 23 was marked for identification.)
 24 BY MS. WIRTH:
 25 Q This is dated Monday, February 24, 1997. Is that

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1 right?
 2 A Yes.
 3 Q And, again, each of the pages here is marked
 4 redacted. Is that correct?
 5 A Yes.
 6 Q On page 2, who is Sylvia? It says "Sylvia's weekly
 7 short-term meeting." Is that correct?
 8 A Sylvia Matthews is the Deputy Chief of Staff and
 9 this is a meeting but it's not held every week. From time to
 10 time, she holds a meeting that takes place immediately after
 11 Erskine's morning meeting.
 12 Q Okay. And so this refers to Sylvia's weekly
 13 short-term meeting?
 14 A Yes. Yes.
 15 Q Okay. On page 4 of this document, it says,
 16 "The President sat in the Oval," that's the Oval Office,
 17 correct?
 18 A Yes.
 19 Q "For 30 minutes working on his speech." Does this
 20 document indicate what time he was doing that? At what time
 21 of day?
 22 A I'm not sure whether it does or not. I don't -- I
 23 don't recall what was on that.
 24 Q Okay. So for the portion that appears here that's
 25 not redacted, you don't see a time?

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1 A No.
 2 Q If the President had had visitors during the time
 3 that he was in the Oval Office working on his speech, would
 4 that be recorded here?
 5 A I'm not sure. Possibly, if I had known. I'm sure
 6 I got this information from a document.
 7 Q Okay. And tell us, you know, if you do see
 8 reference in the records that you receive of visits by
 9 visitors of a personal nature, let's say, when do you include
 10 those in your record that you keep?
 11 A Can you ask that again?
 12 Q Sure. If in the records that you receive that you
 13 use to create your document you see reference to visits of a
 14 personal nature to the President, when do you put those in
 15 your document? Do you always put them in or do you use some
 16 judgment on that?
 17 A I almost always put those in. I can't think of any
 18 reason why I wouldn't.
 19 Q And do you often see references to personal visits
 20 in the documents that you receive?
 21 A Not often, but I do from time to time.
 22 Q And have you ever put a personal visit in your
 23 record because you observed it yourself?
 24 A Yes.
 25 Q Okay. And do you always put a personal visit that

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1 you have observed yourself in the record that you keep?
 2 A Depends on what I think it would serve
 3 historically. I mean, if I knew a military aide walked in
 4 and needed to talk to the President, I wouldn't put that in.
 5 No.
 6 Q Okay. But if a friend did, you would put that in.
 7 A Yes.
 8 Q If you observed it yourself.
 9 A If I observed -- yes.
 10 Q Have you ever seen Monica Lewinsky visit the
 11 President?
 12 A I have not.
 13 Q Have you ever seen her with the President anywhere?
 14 A I saw her at a radio address with lots of other
 15 people.
 16 Q Do you remember when that was?
 17 A No, I don't.
 18 Q Do you record in the record that you keep the names
 19 of all people who attend radio addresses?
 20 A No, I don't record all people.
 21 Q Other than the incident where you saw her -- let's
 22 talk about that for a moment. Were you attending the radio
 23 address as well?
 24 A I was not attending, but as a part of the Oval
 25 Office, everyone kind of works on the radio address, helps

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1 out.
 2 Q Okay. And you saw her in the room where the radio
 3 address was given?
 4 A Yes.
 5 Q What room is that?
 6 A I can't recall because it's either given in the
 7 Roosevelt Room or the Oval Office and vaguely I remember it
 8 being in the Roosevelt Room.
 9 Q Okay. And do you know if she attended in the
 10 company of anybody else that day?
 11 A I do not.
 12 Q Do you know if she spoke to the President that day?
 13 A I'm sure she did because everyone that was there
 14 did. Everyone took pictures and greeted the President.
 15 Q Did you see her speak to the President?
 16 A I don't remember seeing her speak to the President.
 17 Q Other than that one occasion when you saw
 18 Ms. Lewinsky attending a radio address, have you ever seen
 19 her in the same room with the President?
 20 A Not that I can recall. No.
 21 Q Have you ever seen her speaking to the President?
 22 A No.
 23 Q Have you ever heard from anyone else that she had
 24 either met the President or spoken to him?
 25 A No.

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1 Q Do you have any knowledge whatsoever whether the
 2 President has ever received or made any telephone calls to o
 3 from Ms. Lewinsky?
 4 A No.
 5 Q All right. If the President were to make a phone
 6 call from the residence, do you know where that would be
 7 recorded?
 8 A No, I don't. I'm not sure where that would be
 9 recorded.
 10 Q And do you know who would know the answer to that?
 11 A No.
 12 Q And the ushers' log does not contain phone calls,
 13 to your knowledge?
 14 A To my knowledge, it doesn't.
 15 Q Okay. At the end of this document, the last page,
 16 again, there's a notation of telephone calls. Sometimes in
 17 the records that we're looking at there are many calls,
 18 sometimes just a few. Can you explain that? Why that would
 19 be the case?
 20 A No.
 21 Q Is it just because the records you receive,
 22 sometimes you get lots of log entries for phone calls and
 23 sometimes you don't?
 24 A Yes. It's based on the log.
 25 MS. WIRTH: Okay. JFK-7 we'll look at next, which

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1 is a four-page document.
 2 (Grand Jury Exhibit No. JFK-7
 3 was marked for identification.)
 4 BY MS. WIRTH:
 5 Q This is dated Friday, February 28, 1997. Is that
 6 right?
 7 A Yes.
 8 Q And each page of this is also marked redacted?
 9 A Yes.
 10 Q Okay. On the third page, it says "The President
 11 was joined in the Roosevelt Room by." What has been redacted
 12 from this document? Would that be, to your knowledge, a list
 13 of people who were in the Roosevelt Room?
 14 A I would think that would be a person or people or a
 15 group.
 16 Q Okay. If it were the case that on this day the
 17 President did a radio taping, and you said earlier that could
 18 be in the Roosevelt Room, would you or would you not list all
 19 the people who attended the taping?
 20 A I would likely not list all the people.
 21 Q Would you list some?
 22 A Sometimes I would, yes.
 23 Q And what would you use in your decision to choose
 24 certain names to list and not others?
 25 A If it was friends of his, people from Arkansas,

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<p>1 people he had worked with before, cabinet members, VIPs of 2 some sort. 3 Q And this, again, is a document that you generated, 4 correct? 5 A Yes. 6 Q Okay. All of these are that you've testified about 7 so far -- 8 A Yes. 9 Q -- except for the phone logs that I showed you? 10 A Yes. Yes. 11 MS. WIRTH: Okay. All right. And JFK-8 we'll do 12 next, which is a two-page document. 13 (Grand Jury Exhibit No. JFK-8 14 was marked for identification.) 15 BY MS. WIRTH: 16 Q This is dated Thursday, March 13, 1997, is it not? 17 A Yes. 18 Q And this is also your document? 19 A Yes. 20 Q That you generated? 21 A Yes. 22 Q And both pages are also marked redacted, right? 23 A Yes. 24 Q Okay. And where it says on the first page under 25 "Today before departing on his North Carolina-Miami trip this</p>	<p>1 Q And this is also marked redacted. 2 A Yes. 3 Q And this records -- it looks like just telephone 4 calls, based on what we have right here. 5 A Right. 6 Q Okay. And, again, the names of anyone that the 7 President spoke to don't appear on this document. They've 8 been redacted out? 9 A Right. 10 MS. WIRTH: All right. JFK-10, which is a 11 four-page document dated Monday, April 7, 1997. 12 (Grand Jury Exhibit No. JFK-10 13 was marked for identification.) 14 BY MS. WIRTH: 15 Q This is your document that you generated? 16 A Yes. 17 Q And that's the correct date? 18 A Yes. 19 Q And each page is marked redacted? 20 A Yes. 21 Q All right. And the last page on this document also 22 records several telephone calls, correct? 23 A Yes. 24 Q And, again, with the names taken out. 25 A Yes.</p>
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<p>1 morning, the President made a brief, quite solemn press 2 statement about the killing last night of seven Israeli 3 children by a soldier." You wrote that? 4 A Yes. 5 Q And do you make that statement, that it was "quite 6 solemn" based on your own personal observation of this 7 statement -- 8 A Yes. 9 Q -- that the President made? 10 A Yes. 11 Q Okay. Okay. This one does not appear to have any 12 phone calls. Is that right? 13 A I don't see any, no. 14 Q The President was traveling that day and it says he 15 left at 8:30 a.m.? 16 A Yes. 17 MS. WIRTH: Okay. All right. JFK-9, which is a 18 one-page document. 19 (Grand Jury Exhibit No. JFK-9 20 was marked for identification.) 21 BY MS. WIRTH: 22 Q That is dated Saturday March 29, 1997, correct? 23 A Yes. 24 Q And that is a document you generated? 25 A Yes.</p>	<p>1 MS. WIRTH: Okay. JFK-11, which is an eight-page 2 document. 3 (Grand Jury Exhibit No. JFK-11 4 was marked for identification.) 5 BY MS. WIRTH: 6 Q It's dated Wednesday, April 16, 1997? 7 A Yes. 8 Q And this is a document you generated? 9 A Yes. 10 Q And each page is marked redacted? 11 A Yes. 12 Q All right. On the second page, you have under 13 "Today" a series of events that took place or meetings by 14 specific time. 15 A Yes. 16 Q Okay. And that's taken off the schedule, the 17 President's schedule? Is that right? 18 A Yes. It could have -- I mean, it could have come 19 from other things, but the schedule for sure was used in 20 this. 21 Q Would you have attended any of these meetings 22 yourself? 23 A No. No. 24 Q Okay. It says at the top "The President had a 25 meeting," for example, "in the residence from 10:00 a.m.</p>

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1 to 11:30 a.m." You know the duration of that meeting from
2 the schedule? Is that correct?

3 A Yes.

4 Q And it doesn't say with whom it was?

5 A No.

6 Q Is that because the name of the person wasn't on
7 the schedule?

8 A I'm sure. I'm sure that's the reason.

9 Q Okay. Okay. And, again, the very last page is
10 your list of telephone calls, again, with the names redacted.
11 Correct?

12 A Yes.

13 Q And that one includes one call at 12:23 a.m.?

14 A Yes.

15 MS. WIRTH: All right. JFK-12, which is nine
16 pages.

(Grand Jury Exhibit No. JFK-12
was marked for identification.)

17 BY MS. WIRTH:

18 Q This is dated Thursday, May 1, 1997, correct?

19 A Yes.

20 Q And this is a document you generated?

21 A Yes.

22 Q And each page is marked redacted?

23 A Yes.

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1 Q Okay. And, again, at the end, there's a long list
2 of phone calls, right?

3 A Yes.

4 Q And one is marked "Conference call"?

5 A Yes.

6 Q And in your list at the end, which participants
7 would you note for a conference call in this category at the
8 end?

9 A Would you repeat that?

10 Q Sure. Where it says "Conference call"?

11 A Right.

12 Q 11:25 p.m.?

13 A Uh-huh.

14 Q Would you list all the participants at the end here
15 in the conference call or just some?

16 A I would list the principals, who was involved, the
17 President and whoever the principal person he was talking to,
18 not the staff who would be on the conference call.

19 Q Okay. And, again, the logs that you used to
20 generate this telephone portion of the record that you keep
21 do not tell you where the call was made from, if the
22 President made the call, it doesn't tell you whether he made
23 it from the Oval Office or from the residence or from outside
24 the Oval Office.

25 A It doesn't spell it out and if it tells me by the

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1 in and out, I don't refer to that at all.

2 Q When the President travels, for example, if he were
3 in New York and he made telephone calls then, are the
4 recorded by you as well?

5 A Yes.

6 Q So there are logs kept of those calls, too?

7 A I don't know. I would guess they're on the
8 logs that you showed me, the same logs that you showed
9 me have all his calls. I'm sure that's where I got them
10 from.

11 Q Okay. So, for example, in the last few weeks,
12 the President's been out of town. You've been doing his
13 schedule?

14 A Yes.

15 Q If you saw that he participated in a telephone
16 call while he was away, either receiving it or making it --

17 A Yes.

18 Q -- you would record that in the record that you
19 kept?

20 A Yes.

21 Q And would that be because you received a log page
22 that indicated such a phone call was either made or received?

23 A Yes.

24 Q So that the procedure is no different when he's out
25 of town?

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1 A Right. Right.

2 Q Okay. All right. And, again, just so the record
3 is clear, you have no knowledge whether the records that you
4 receive are a complete record of every phone call that the
5 President either makes or receives on any given day.

6 A I have no knowledge of that.

7 Q Has anybody ever told you whether it is --

8 A No.

9 Q -- a complete record of that?

10 A No.

11 MS. WIRTH: All right. JFK-13, which is eight
12 pages long.

(Grand Jury Exhibit No. JFK-13
was marked for identification.)

13 BY MS. WIRTH:

14 Q This is dated Friday, May 2, 1997. Is that
15 correct?

16 A Yes.

17 Q And this is a document that you generated?

18 A Yes.

19 Q Okay. And each page is also marked redacted?

20 A Yes.

21 Q And, at the end, we have a list of quite a few
22 phone calls. Is that correct?

23 A Yes.

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1 Q The very last page?
 2 A Yes.
 3 Q Again, with the names redacted.
 4 A Yes.
 5 MS. WIRTH: Okay.
 6 A JUROR: Can I ask a question? I'm just curious.
 7 MS. WIRTH: Sure.
 8 A JUROR: On the JFK-13-7, the next to the last
 9 page, you have "The President ate dinner at 9:30 p.m. and
 10 retired at 10:30 p.m." but in the day notes, you also have
 11 the President ate dinner at 9:30 p.m. Why would that be
 12 listed twice?
 13 THE WITNESS: Just an oversight.
 14 A JUROR: Oh, okay. Just checking. I thought
 15 maybe it was something special.
 16 THE WITNESS: No.
 17 MS. WIRTH: Okay. JFK-14 is a one-page document.
 18 (Grand Jury Exhibit No. JFK-14
 19 was marked for identification.)
 20 BY MS. WIRTH:
 21 Q It's dated, is it not, Saturday, May 24, 1997?
 22 A Yes.
 23 Q All right. And this is your record that you
 24 generated?
 25 A Yes.

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1 Q And it contains a list of three phone calls,
 2 correct?
 3 A Yes.
 4 Q With the names taken out?
 5 A Yes.
 6 Q Now, in the first entry under "Day Notes," it says
 7 "The President spent most of his 'day off' at the Oval Office
 8 working except for two hours he spent with Roger on the White
 9 House putting green from 2:30 to 5:00 p.m." Do you know who
 10 Roger is?
 11 A His brother.
 12 Q Okay. So that's Roger Clinton?
 13 A Yes.
 14 MS. WIRTH: Okay. Thank you.
 15 JFK-15, which is a one-page document.
 16 (Grand Jury Exhibit No. JFK-15
 17 was marked for identification.)
 18 BY MS. WIRTH:
 19 Q Friday May 30, 1997 is the date on this document.
 20 Is that right?
 21 A Yes.
 22 Q And this is your record?
 23 A Yes.
 24 Q It's marked redacted?
 25 A Yes.

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1 Q And it contains -- it appears based on what we have
 2 here -- solely a list of phone calls with the names redacted,
 3 correct?
 4 A Yes.
 5 MS. WIRTH: Okay. JFK-16, which is a four-page
 6 document.
 7 (Grand Jury Exhibit No. JFK-16
 8 was marked for identification.)
 9 BY MS. WIRTH:
 10 Q The date on that is Wednesday, June 11, 1997?
 11 A Yes.
 12 Q And each page is marked redacted?
 13 A Yes.
 14 Q And this is your record?
 15 A Yes.
 16 Q And, again, the last entry is a list of phone
 17 calls including -- it looks like two conference calls,
 18 right?
 19 A Yes.
 20 Q With the names redacted of the people involved?
 21 A Yes.
 22 Q And it says on the bottom "Conference call,"
 23 there's a blank and then a comment and then WSJ. What does
 24 that stand for?
 25 A It looks to be Wall Street Journal, so I'm guessing

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1 that's a media conference call.
 2 Q Okay. And on the previous page, is it common for
 3 the President to participate in media conference calls?
 4 A He doesn't do it on a regular basis, but he does it
 5 from time to time, yes.
 6 Q Okay. On the previous page, at the top, the second
 7 bullet, where it says from 4:08 to 4:13 p.m. he visited with
 8 blank, long time friends in the Oval, that's an instance
 9 where you recorded a visit by --
 10 A Yes.
 11 Q -- friends, it appears.
 12 A Yes.
 13 MS. WIRTH: Okay. Okay. Next is JFK-17, which is
 14 a five-page document.
 15 (Grand Jury Exhibit No. JFK-17
 16 was marked for identification.)
 17 BY MS. WIRTH:
 18 Q The date on it is Monday, June 16, 1997, correct?
 19 A Yes.
 20 Q And this is your document?
 21 A Yes.
 22 Q And each page is marked redacted?
 23 A Yes.
 24 Q And the bottom entry on the next to the last page,
 25 going over to the last page, are what looks like three phone

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<p>1 calls, correct?</p> <p>2 A Yes.</p> <p>3 Q With the names redacted of the participants?</p> <p>4 A Yes.</p> <p>5 MS. WIRTH: Okay. Okay. JFK-18.</p> <p>6 (Grand Jury Exhibit No. JFK-18</p> <p>7 was marked for identification.)</p> <p>8 BY MS. WIRTH:</p> <p>9 Q It's three pages long, correct?</p> <p>10 A Yes.</p> <p>11 Q And this is dated June 24, 1997?</p> <p>12 A Yes.</p> <p>13 Q And this is your document that you created?</p> <p>14 A Yes.</p> <p>15 Q Each page is marked redacted?</p> <p>16 A Yes.</p> <p>17 Q And the last category on the second page going over</p> <p>18 to the last page is a list of the phone calls?</p> <p>19 A Yes.</p> <p>20 Q With the names redacted?</p> <p>21 A Yes.</p> <p>22 Q And in the bullet entry above the phone calls</p> <p>23 on the second page, it says, "The President, Mrs. Clinton</p> <p>24 and a guest ate dinner at the pool at 8:12 p.m." In</p> <p>25 this case, there is no name.</p>	<p>1 blank, "at 11:36 a.m." And it appears that what has been</p> <p>2 redacted there are the participants in the conference call</p> <p>3 Is that correct?</p> <p>4 A I'd have to guess.</p> <p>5 Q Okay. Is there any reason why that phone call</p> <p>6 would be noted in text as opposed to down below?</p> <p>7 A The only reason I would guess would be because it</p> <p>8 was on the schedule as an official call.</p> <p>9 MS. WIRTH: All right. JFK-20 is three pages.</p> <p>10 (Grand Jury Exhibit No. JFK-20</p> <p>11 was marked for identification.)</p> <p>12 BY MS. WIRTH:</p> <p>13 Q It is dated Monday, July 14, 1997. Is that</p> <p>14 correct?</p> <p>15 A Yes.</p> <p>16 Q And this is your record that you generated?</p> <p>17 A Yes.</p> <p>18 Q And each page is marked redacted?</p> <p>19 A Yes.</p> <p>20 Q And the last page contains your listing of phone</p> <p>21 calls, correct?</p> <p>22 A Yes.</p> <p>23 Q Including a conference call?</p> <p>24 A Yes.</p> <p>25 Q And the names are redacted?</p>
Page 78	Page 80
<p>1 Can you tell us why that is? Is it because the</p> <p>2 record you received didn't contain a name or there was a</p> <p>3 decision not to put it in?</p> <p>4 A I don't recall at all. I don't.</p> <p>5 Q Okay. Is there ever an instance where you have the</p> <p>6 name but you don't record it in your record?</p> <p>7 A None that I can recall.</p> <p>8 MS. WIRTH: Okay. All right. The next is JFK-19,</p> <p>9 which is one page.</p> <p>10 (Grand Jury Exhibit No. JFK-19</p> <p>11 was marked for identification.)</p> <p>12 BY MS. WIRTH:</p> <p>13 Q It's dated Friday, July 4, 1997. Is that correct?</p> <p>14 A Yes.</p> <p>15 Q And it's marked redacted?</p> <p>16 A Yes.</p> <p>17 Q And it also contains at the bottom under</p> <p>18 "Day Notes" a list of phone calls, correct?</p> <p>19 A Yes.</p> <p>20 Q With the names redacted, correct?</p> <p>21 A Yes.</p> <p>22 Q And it notes at the top, "The President proceeded</p> <p>23 to the Oval at 8:40 a.m.," correct?</p> <p>24 A Yes.</p> <p>25 Q "He made a conference call and then there's a</p>	<p>1 A Yes.</p> <p>2 MS. WIRTH: All right. JFK-21 is three pages.</p> <p>3 (Grand Jury Exhibit No. JFK-21</p> <p>4 was marked for identification.)</p> <p>5 BY MS. WIRTH:</p> <p>6 Q It's dated Wednesday, July 16, 1997. Is that</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q And each page is marked redacted?</p> <p>10 A Yes.</p> <p>11 Q And the last page contains telephone entries?</p> <p>12 Is that correct?</p> <p>13 A Yes.</p> <p>14 MS. WIRTH: Okay. JFK-22.</p> <p>15 (Grand Jury Exhibit No. JFK-22</p> <p>16 was marked for identification.)</p> <p>17 BY MS. WIRTH:</p> <p>18 Q It's one page, correct?</p> <p>19 A Yes.</p> <p>20 Q The date is Thursday, July 24, 1997?</p> <p>21 A Yes.</p> <p>22 Q This is the record you generated?</p> <p>23 A Yes.</p> <p>24 Q And on the bottom, it contains a record of three</p> <p>25 phone calls --</p>

Page 81	Page 83
<p>1 A Yes.</p> <p>2 Q -- with the President?</p> <p>3 A Yes.</p> <p>4 Q With the names redacted?</p> <p>5 A Yes.</p> <p>6 MS. WIRTH: Okay. JFK-23 is one page.</p> <p>7 (Grand Jury Exhibit No. JFK23</p> <p>8 was marked for identification.)</p> <p>9 BY MS. WIRTH:</p> <p>10 Q It's dated Saturday, August 16, 1997. Is that</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q And this is the record you generated?</p> <p>14 A Yes.</p> <p>15 Q And the middle bullet point is a list of phone</p> <p>16 calls, correct?</p> <p>17 A Yes.</p> <p>18 Q With the names redacted?</p> <p>19 A Yes.</p> <p>20 MS. WIRTH: Okay. JFK-24 is three pages.</p> <p>21 (Grand Jury Exhibit No. JFK24</p> <p>22 was marked for identification.)</p> <p>23 BY MS. WIRTH:</p> <p>24 Q It's dated Thursday, September 11, 1997. Is that</p> <p>25 right?</p>	<p>1 A Yes.</p> <p>2 Q Okay. And do you have any idea whether those are</p> <p>3 personal meetings or official meetings?</p> <p>4 A I do not.</p> <p>5 MS. WIRTH: Okay. All right. JFK-25 is three</p> <p>6 pages.</p> <p>7 (Grand Jury Exhibit No. JFK-25</p> <p>8 was marked for identification.)</p> <p>9 BY MS. WIRTH:</p> <p>10 Q It's dated Friday, September 12, 1997.</p> <p>11 A Yes.</p> <p>12 Q And each page is marked redacted.</p> <p>13 A Yes.</p> <p>14 Q That is a record you generated?</p> <p>15 A Yes.</p> <p>16 Q And, again, on the last page, near the bottom,</p> <p>17 three entries up, is a list of telephone calls. Is that</p> <p>18 correct?</p> <p>19 A Yes.</p> <p>20 Q With the names redacted.</p> <p>21 A Yes.</p> <p>22 Q Okay. And where it says underneath that "The</p> <p>23 President ate dinner at 8:00 a.m.," that's a mistake,</p> <p>24 correct?</p> <p>25 A Yes.</p>
Page 82	Page 84
<p>1 A Yes.</p> <p>2 Q And each page is also marked redacted?</p> <p>3 A Yes.</p> <p>4 Q And the last entry is a list of phone calls? Is</p> <p>5 that correct?</p> <p>6 A Yes.</p> <p>7 Q And at least one of them is a conference call?</p> <p>8 A Yes.</p> <p>9 Q And they appear to be at least partially out of</p> <p>10 order as to time, the phone calls? Out of chronological</p> <p>11 order. There's a 10:34 noted at the bottom, a.m.?</p> <p>12 A Yes, Yes.</p> <p>13 Q Okay. At the top of that last page, in the second</p> <p>14 paragraph, it says, "The President had two unscheduled</p> <p>15 meetings." Do you see that?</p> <p>16 A Yes.</p> <p>17 Q "This evening before he walked over to the</p> <p>18 residence for the rescheduled congressional</p> <p>19 picnic/reception." And then there's a parenthetical.</p> <p>20 And then it says "He met" below that and something's been</p> <p>21 taken out, from 6:21 to 6:58 p.m. and a meeting, again,</p> <p>22 another blank, from 6:59 to 7:13 p.m.</p> <p>23 A Yes.</p> <p>24 Q And it appears that the participants have been --</p> <p>25 their names have been removed. Is that right?</p>	<p>1 MS. WIRTH: All right. JFK-26 is six pages.</p> <p>2 (Grand Jury Exhibit No. JFK-26</p> <p>3 was marked for identification.)</p> <p>4 BY MS. WIRTH:</p> <p>5 Q This is a document dated Monday, September 22,</p> <p>6 1997.</p> <p>7 A Yes.</p> <p>8 Q And it is a document you generated?</p> <p>9 A Yes.</p> <p>10 Q And each page is marked redacted?</p> <p>11 A Yes.</p> <p>12 Q And the last page contains a reference to at least</p> <p>13 three telephone calls with the names redacted, is that</p> <p>14 correct?</p> <p>15 A Yes.</p> <p>16 Q And on this day, it looks like -- at the beginning</p> <p>17 it says "The President was in New York today to make a U.N.</p> <p>18 address," et cetera, correct?</p> <p>19 A Yes.</p> <p>20 Q And so it appears that these telephone calls were</p> <p>21 made or received out of town, correct?</p> <p>22 A Yes. I would guess. I mean --</p> <p>23 Q Okay.</p> <p>24 A If he's not in town.</p> <p>25 MS. WIRTH: JFK-27 is one page.</p>

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1 (Grand Jury Exhibit No. JFK27
2 was marked for identification.)
3 BY MS. WIRTH:
4 Q It is Saturday, October 11, 1997, correct?
5 A Yes.
6 Q And that's a document you generated?
7 A Yes.
8 Q And it is much redacted and it contains -- is it
9 not?
10 A Yes.
11 Q And it contains a list of phone calls at the end,
12 correct?
13 A Yes.
14 Q Again, with the names redacted.
15 A Yes.
16 MS. WIRTH: All right. JFK-28 is a two-page
17 document.
18 (Grand Jury Exhibit No. JFK28
19 was marked for identification.)
20 BY MS. WIRTH:
21 Q The date is Thursday, November 13, 1997. Is that
22 right?
23 A Yes.
24 Q And it is marked redacted on both pages?
25 A Yes.

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1 Q And it's a document you generated?
2 A Yes.
3 Q And at the bottom of page 1, it states
4 "He proceeded to the Oval at 6:34 p.m. He was briefed
5 and then materials taken out. He took a foreign call
6 on material taken out at 6:47 p.m." So that's one call
7 that's noted, correct?
8 A Yes.
9 Q And then at the bottom of the second page, there's
10 a whole list of times associated with other phone calls,
11 correct?
12 A Yes.
13 Q Including one conference call?
14 A Yes.
15 Q And the names have been removed of the participants
16 other than the President, correct?
17 A Yes.
18 MS. WIRTH: Okay. All right. And JFK-29 is a
19 three-page document.
20 (Grand Jury Exhibit No. JFK-29
21 was marked for identification.)
22 BY MS. WIRTH:
23 Q It is marked Saturday, December 6, 1997, correct?
24 A Yes.
25 Q And this is a document you generated?

1 A Yes.
2 Q And it's marked redacted on all three pages?
3 A Yes.
4 Q And the final entry going from the second page to
5 the third is the list of phone calls again.
6 A Yes.
7 Q With the names redacted except for the President.
8 A Yes.
9 MS. WIRTH: And JFK-30 is a three-page document.
10 (Grand Jury Exhibit No. JFK-30
11 was marked for identification.)
12 BY MS. WIRTH:
13 Q The date on that is Monday, December 15, 1997,
14 correct?
15 A Yes.
16 Q And this is a document you generated?
17 A Yes.
18 Q Each page is marked redacted?
19 A Yes.
20 Q And the final entry is a list of telephone calls
21 with the President, correct?
22 A Yes.
23 Q And the participants except for him taken out,
24 correct?
25 A Yes.

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1 MS. WIRTH: Okay. And, finally, JFK-31 is one
2 page.
3 (Grand Jury Exhibit No. JFK-31
4 was marked for identification.)
5 BY MS. WIRTH:
6 Q It's dated Sunday, December 28, 1997. Is that
7 correct?
8 A Yes.
9 Q And this is a document you generated?
10 A Yes.
11 Q And the final entry is a list of phone calls with
12 the names redacted?
13 A Yes.
14 Q And that's it. At any time, did you ever have any
15 conversation with anyone about whether Monica Lewinsky's name
16 should appear on any of the records that you generate?
17 A No.
18 Q Did anybody ever speak to you about categories of
19 persons or types of information that should not appear in the
20 records that you keep?
21 A No.
22 Q If the President has like a rest period during
23 the day or a lunch period where he's just eating by himself,
24 not with anyone else, would that be noted in any of the
25 schedules that you receive?

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1 A It would probably note office or phone time.
 2 Q Is that something that you put into your record
 3 that you generate?
 4 A I'm not sure whether I do or not. It's nothing
 5 that I would think would be significant or important, but I
 6 might just because it's on the schedule input it.
 7 Q If you wanted to know what the President was doing
 8 at a particular time of any given day, what would be the best
 9 place to look to obtain that information?
 10 A That's hard -- I mean, I'm not sure I can answer
 11 that question. I don't know.
 12 Q Of all the schedules that you see, which do you
 13 think is the most detailed?
 14 A I would think the annotated schedule, probably, has
 15 the most specific information.
 16 Q Okay. And that's the thing that Mr. Engskov does?
 17 A Yes.
 18 Q This last document that you looked at, JFK-31?
 19 A Yes.
 20 Q There's an entry that says "The President and
 21 Mrs. Clinton attended Foundry United Methodist Church in
 22 Washington."
 23 A Yes.
 24 Q Do you know what time the President and the First
 25 Lady usually attend church on Sunday?

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1 A I don't. I mean, I know about what time, but I
 2 don't know exactly what time.
 3 Q About what time?
 4 A I would say 10:00 or 11:00, between 10:30 and
 5 11:00.
 6 Q Okay. Do you personally know Monica Lewinsky?
 7 A No.
 8 Q Have you ever seen her around the White House?
 9 A No. Except for the one time.
 10 Q Had you ever seen her in the West Wing?
 11 A No.
 12 Q Were you aware at the time that she was working in
 13 the White House that she was an intern there?
 14 A I don't think she worked in the White House since
 15 I've been there.
 16 Q Were you aware at any time that there was a Monica
 17 Lewinsky working in the Office of Legislative Affairs when
 18 she was working there?
 19 A No.
 20 Q Did you ever hear any scuttlebutt about a Monica
 21 Lewinsky being either fired or reassigned from the White
 22 House at the time that occurred?
 23 A I didn't. No.
 24 Q Since then?
 25 A No. You mean other than T.V. and news.

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1 Q Other than T.V. and the news.
 2 A Okay.
 3 Q That's correct. Yes. And other than the one time
 4 when you saw her at the radio address, you've never seen her
 5 anywhere in the White House?
 6 A No.
 7 Q Do you know anything about a relationship between
 8 Monica Lewinsky and the President?
 9 A No.
 10 Q Did you ever hear anything about a relationship
 11 between Monica Lewinsky and the President from anyone else?
 12 A No.
 13 Q Have you ever seen Monica Lewinsky outside the
 14 White House?
 15 A No.
 16 MS. WIRTH: Okay. I'm going to ask you to step
 17 outside at this point and we will call you back in a few
 18 minutes. Thank you.
 19 (Witness excused. Witness recalled.)
 20 THE FOREPERSON: Ms. Kearney, you're still under
 21 oath.
 22 THE WITNESS: Thank you.
 23 MS. WIRTH: Okay. And, for the record, we have a
 24 quorum and there are no unauthorized persons in the grand
 25 jury?

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1 THE FOREPERSON: That is correct.
 2 BY MS. WIRTH:
 3 Q Okay. Ms. Kearney, the grand jurors have given me
 4 a list of questions to ask you. The first question is you
 5 testified that you saw Monica Lewinsky at a radio address.
 6 At that time, had you ever met her?
 7 A No.
 8 Q At that time, did you know who she was?
 9 A No.
 10 Q How is it that you now know that it was Monica
 11 Lewinsky that was at the radio address?
 12 A Because of the news stories and articles that I've
 13 seen since then.
 14 Q Is there anything about her either appearance or
 15 behavior or anything about her whatsoever that made her stand
 16 out so that you remember her now?
 17 A No.
 18 Q Do you know Betty Currie?
 19 A Yes.
 20 Q The grand jury would like to know whether you are
 21 good friends with Betty Currie?
 22 A We are friends.
 23 Q Okay. Do you socialize with her at all?
 24 A I wouldn't say we socialize. We work together and
 25 we're office friends.

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1 Q Okay. Has Betty Currie ever talked to you about
2 Monica Lewinsky?
3 A No.
4 Q Are you aware of any friendship between Betty
5 Currie and Monica Lewinsky?
6 A Only from what I've heard on the news or read.
7 Q Have you ever seen Monica Lewinsky in the company
8 of Betty Currie?
9 A No.
10 Q Talking to her?
11 A No.
12 Q Have you ever heard that Monica Lewinsky called
13 Betty Currie on the phone?
14 A I've read that and I've heard it on the news.
15 Q Other than news reports or what you've heard --
16 A No.
17 Q -- read and heard from newspapers or radio, any
18 knowledge of any telephone calls between those two?
19 A No.
20 Q Do you know any of the people who work in the
21 President's pantry?
22 A I know there's mil. aides that work in the West
23 Wing. Yes.
24 Q Okay. Stewards, they're called?
25 A Yes.

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1 Q Okay. Do you know their names?
2 A I know a couple of their names. Yes.
3 Q Who do you know?
4 A I know one by the name of Nelvis and I know one by
5 the name of Glen.
6 Q Okay. Do you know anything about any friendship or
7 relationship between Monica Lewinsky and Nelvis?
8 A No.
9 Q Did you ever see them talking together, Monica and
10 Mr. Nelvis?
11 A No.
12 Q Do you know of any friendship or relationship
13 between Monica and Glen Mays?
14 A No.
15 Q Did you ever see them talking together?
16 A No.
17 Q The grand jury would also like to know how you came
18 about your job at the White House. How did it happen that
19 you got this job?
20 A I applied for it.
21 Q The grand jury would also like to know whether you
22 worked with Erskine Bowles at the SBA.
23 A I did.
24 Q Is that how you found out about the job?
25 A No.

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1 Q Did you come over with him when he came to the
2 White House?
3 A No, I didn't.
4 Q The grand jury would also like to know -- just for
5 the record, Mr. Binhak has reentered the room -- who at the
6 White House you're close friends with. Who are your friends?
7 A I wouldn't say I'm close friends with anyone at the
8 White House. I work closer with Betty Currie than I do with
9 anyone else.
10 Q Okay. Would she be the person that you consider
11 yourself most friendly with in terms of a personal
12 relationship?
13 A I would say so. Yes.
14 Q And who are the people you talk to at work? Just
15 social chit chat, things like that.
16 A I don't do a lot of social chit chat at work.
17 Probably no one.
18 Q Okay. Do you talk socially to Betty?
19 A Very seldom.
20 Q Have you ever called her at home or has she ever
21 called you at home?
22 A A few times. Very, very seldom.
23 Q Was it personal or business-related, those calls?
24 A Usually business.
25 Q Okay. The grand jury would also like to know what

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1 your work hours are. You said you start at 7:30. How late
2 do you work?
3 A It depends. It depends on the President's
4 schedule. It depends on whether I'm working on something I
5 want to finish. I can be there as late as 8:30, 9:00, 10:00.
6 I don't have any set work hours.
7 Q Okay. And do you work weekends? They would also
8 like to know that.
9 A Yes, I do.
10 Q How often?
11 A Pretty often.
12 Q The grand jury also would like to know with respect
13 to your testimony about visits or phone calls from military
14 aides, stewards, that sort of thing that you generally omit
15 those from the record that you keep, both in the category of
16 visits and in the category of telephone calls. Is that
17 right?
18 A I usually don't put them into the computer.
19 Q And the grand jury would like to know whether that
20 was a judgment that you made on your own or whether anyone
21 had ever advised you that that category should be omitted
22 from your record.
23 A Oh, no. That's completely on my own because
24 I don't find any historical relevance to putting that
25 in.

1 Q Okay. Now, the grand jury would also like to
2 know with respect to the friends of the President whose
3 names you note in your record that you keep whether in
4 relation to -- well, in relation to a visit, for example,
5 how do you make -- do you make any judgment calls as to
6 which friends should be included in the record you make
7 and which should not?

8 A Usually not. No. I mean, if it's a friend of
9 his, usually I put it in.

10 Q Is there any instance that you can recall when you
11 have omitted a person's name from the record that you keep
12 who you would categorize as either a friend or social
13 acquaintance of the President?

14 A No.

15 Q The grand jury would also like to know what your
16 concern is in creating the document that you create. They
17 asked whether accuracy is your primary concern or whether
18 you're concerned about what information will appear favorable
19 historically. What is your concern in creating this
20 document?

21 A Having an accurate history of what happened during
22 this presidency. And I would also add anecdotal information
23 as well.

24 MS. WIRTH: Okay. Can anybody think of anything
25 else?

1 A JUROR: Yes.

2 MS. WIRTH: Yes?

3 A JUROR: In your previous job, what was your title
4 before you came to the White House?

5 THE WITNESS: I was Director of Public Affairs at
6 SBA.

7 A JUROR: And do you have anything like a degree in
8 history?

9 THE WITNESS: My degree is in journalism.

10 A JUROR: Ms. Kearney, previously I thought you
11 testified that the job was created for you at the White
12 House?

13 THE WITNESS: I don't think I said that.

14 A JUROR: You didn't say that?

15 THE WITNESS: No. I said no one held the position
16 before. It wasn't created for me.

17 A JUROR: Oh, okay. I'm sorry.

18 MS. WIRTH: Okay. Anyone else?

19 (No response.)

20 MS. WIRTH: Okay. Thank you very much.

21 If anything occurs to you outside the grand jury
22 that in the line of things that you now remember that you
23 didn't remember when you were testifying, as sometimes
24 happens, if you would contact either me or Mr. Binhak through
25 your lawyer, we would appreciate that.

1 THE WITNESS: All right.

2 MS. WIRTH: Thank you.

3 THE WITNESS: Thank you.

4 (The witness was excused.)

5 (Whereupon, at 11:50 a.m., the taking of testimony
6 in the presence of a full quorum of the Grand Jury was
7 concluded.)

8 * * * * *

Friday, June 7, 1996

Senior Staff's Meeting...

- Day off for the President, except for a 9:30 meeting he agreed to.

- Economic news.

- National Security Council...

968-DC-00000203

- Legal...

REDACTED



NON-RESPONSIVE
PAGES REMOVED

0 003563

2113

- Political...

968-DC-00000204

REDACTED

- Cabinet Affairs...



0 003564

Today's News...

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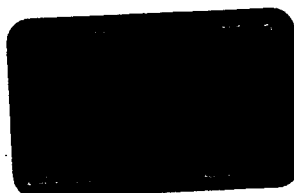
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968-DC-00000205



0 003565

2115

Today...

968-DC-00000206

REDACTED

from 9 p.m. - 12 a.m.

visited the President

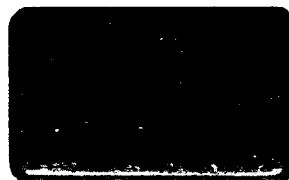


0 003566

- The President spoke to:
 - at 8:31 a.m.;
 - 1:26 p.m.;
 - p.m.;
- 6:17 a.m.;
- 0:38 a.m.;
- 2:06 p.m.;
- 7:07 p.m.;
- 7:21

968-DC-00000207

REDACTED



Thursday, August 29, 1996

- The President talked with:

12:06 a.m.
, 2:55 p.m.
, 2:43 p.m.
, 3 p.m.
, 3:41 p.m.

REDACTED

968-DC-00000208



0 003568

Friday, October 11, 1996

Senior Staff Meeting

- Leon...The President's schedule today is "down."

- NSC...

968-DC-00000209

REDACTED

NON-RESPONSIVE
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0 003569

- Legislative.

- Cabinet Affairs..

- Rahm..

- Jodie.

- Intergovernmental.

- MAC...

968-DC-00000210

- McCurry

- OVP.

- Economics

REDACTED



0 003570

2120

- Political.

Today's News...

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REDACTED

968-DC-00000211



0 003571

2121

Daynotes...

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968-DC-00000212

REDACTED

- The President was "down" today, and took the opportunity to golfing alone, playing with the pro at the Army/Navy Golf Course. He left at 1:04 p.m., and returned around 4 p.m.

He and Mrs. Clinton departed 25 minutes enroute the AIDS quilt exhibition on the capitol mall


0 003572

They departed the mall 15 minutes later, enroute the M



street Clinton/Gore campaign headquarters to greet, and say Thank-You to the campaign staff and volunteers there. He was there almost an hour

- The president called "all the President's men - and women" together this evening at 8 p.m. for a strategy meeting before he left on his six day trip to the West - and his final debate.

The president
Ebeling eat dinner in the Solarium at 6:30 p.m.

The President, watched "First Wives Club" in the family theatre at 9:55 p.m., then proceed to third floor.

the Presiden retire at 12 midnight

- The President talked, via telephone, with:

11:06 a.m.
 , 11:20 a.m.
 , 11:40 a.m.
 2:17 p.m.
 7 a.m., " 1:30 a.m.
 7 a.m.
 7:36 a.m.

REDACTED

968-DC-00000213



Thursday, October 24, 1996

Senior Staff Meeting

- Leon...President will be leaving shortly (at 8:30 a.m.) for Birmingham, AL. He goes to Lake Charles, LA for a Welfare to Work message, then on to New Orleans where he does a DNC reception, a community policing event and meets with New Orleans's African American leadership. He spends the night in New Orleans, and goes on to Atlanta and Macon, GA tomorrow.

- Political

- NSC.

968-DC-00000214

REDACTED

NON-RESPONSIVE
PAGES REMOVED

- Cabinet Affairs.



0 003574

2124

- Rahm..

- Gene..

- Intergovernmental..

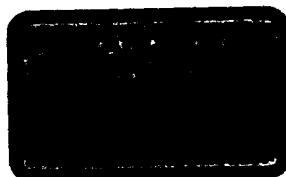
968-DC-00000215

- OVP.

Today's News...

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REDACTED



0 003575

2125

Daynotes...

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- The president talked, via phone, with:
 - , 8:15 a.m.
 - Conference Call

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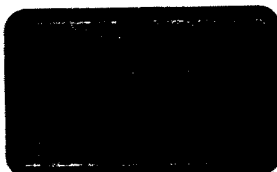
4:50 p.m.
5:15 p.m.

7:46 p.m.

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968-DC-00000216

REDACTED



0 003576

Tuesday, December 17, 1996

Senior Staff Meeting

- Leon...The President's schedule today changed from "down" all day, to meetings all morning - including a follow-up with Prime Minister John Bruton, a photo-op with the AIDS Task Force as they deliver the AIDS Strategy report to him in the Oval office; his regular meetings with Tony, Leon, and now Erskine.

- NSC..

- Legislative.

REDACTED

968-DC-00000217



0 003577

2127

- Economy...
- Political...
- Legal...
- Intergovernmental...

Today's News...

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REDACTED

968-DC-00000218



0 003578

2128

Today...

- The President met with Leon this morning briefly before the meeting with Carol Rasco and Patsy Flemming about the National AIDS Strategy Presentation and Photo

REDACTED

- The President held a Foreign Policy Team meeting in the Oval @ 10:30.
- The President met with Prime Minister John Bruton of Ireland, at @ 10 a.m.

968-DC-00000219



0 003579

2129

- The President spent @ an hour taking WH office photos with staff.

Daynotes...

968-DC-00000220

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REDACTED

- The President talked, via phone, with:



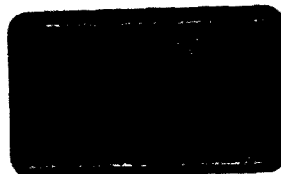
0 003580

2130

2:12 p.m.
1:46 p.m.
1:49 p.m.
2:02 p.m.
2:23 p.m.
2:28 p.m.
1, 2:35 p.m.
2:39 p.m.
2:53 p.m.
9:53 p.m.
10:11 p.m.

REDACTED

968-DC-00000221



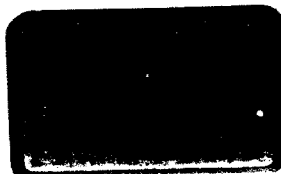
Monday, December 30, 1996

- The President and Mrs. Clinton departed the WH at 11:29 for Hilton Head, SC and the annual Renaissance Weekend, sponsored by friends Phil and Linda LaSourd Lader.
- The President went to Fazio Golf Course directly from the airport, where he remained for four hours (from 2 p.m. to 6 p.m.)
- The President talked, via phone, with:
 - , 10:37 a.m.
 - 10:49 a.m.
 - 12:19 a.m.
 - 9:27 a.m.
 - , 9:25 a.m.
 - 10:02 a.m.

968-DC-00000222

REDACTED

0 003582



Monday, February 24, 1997

Today's news summary...

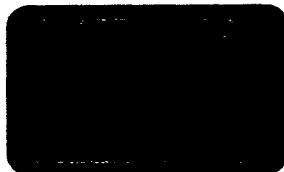
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Oval Office Morning meeting...

NON-RESPONSIVE
PAGES REMOVED

REDACTED

968-DC-00000223



0 003583

2133

Sylvia's weekly short-term meeting

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•

•

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968-DC-00000224

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REDACTED

•

•



0 003584

2134

•
•

Today...

- The President did an event this morning with the Historically Black College Presidents in the State Dining Room

[Before he participated in a photo-op/reception with the group, the President was briefed for the event by

968-DC-00000225

REDACTED




0 003585

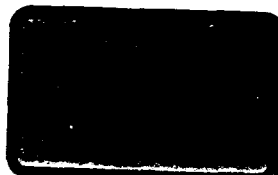
2135

- The President's next public event of the day was his speech to the American Council of Educators, at the Grand Hyatt Hotel.

[The President sat in the Oval for 30 minutes working on his speech

REDACTED

968-DC-00000226



0 003586

2136

- At @ 7 p.m., the President departed the WH for the Democratic Business Council Dinner, located at the Sheraton Carlton Hotel at 16th and K streets.

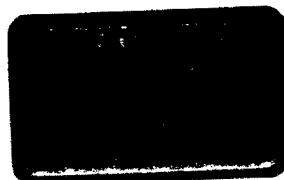
968-DC-00000227

REDACTED

Daynotes...

- The President talked, via phone, with:

12:27 a.m.



2137

12:00 p.m.

9:43 a.m.

, 12:59 p.m.

5:53 p.m.

5:25 p.m.

5:32 p.m.

6:10 p.m.

12:07 p.m.

9:40 p.m.

10:20 p.m.

11:42 p.m.

8:47 p.m.

REDACTED

968-DC-00000228



0 003588

Friday, February 28, 1997

Oval Office morning meeting..

REDACTED

Today...

- The President's first meeting this morning was with Erskine

968-DC-00000229

- His second meeting was the congressional meeting

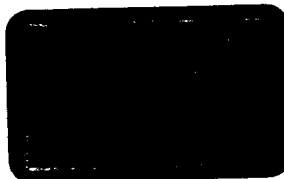


0 003589

- The next meeting of the day was actually briefing for his one public event - the anti-teen smoking event held in the Roosevelt room.

968-DC-00000230

REDACTED



0 003590

2140

- The President was joined in the Roosevelt room by

Daynotes...

- The President talked, via phone, with:

2:12 p.m.
, 2:23 p.m.
, 2:34 p.m.
2:48 p.m.
, 4:08 p.m.

968-DC-00000231

REDACTED


0 003591

- The President and Mrs. Clinton attended an annual party at



2141

Ambassador Molly Raiser's residence from 8:03 p.m to 11:30
p.m.

968-DC-00000232

REDACTED

0 003592



Thursday, March 13, 1997

[The President came into the Oval quite early - 8 a.m. - this morning. He was leaving at 8:30 a.m. for North Carolina.]

Oval Office meeting...

- Nancy...The President's schedule today includes an address to the NC legislature; three fundraisers in Miami; a school construction event and a golf tournament.

REDACTED

Today...

- Before departing on his North Carolina-Miami trip this morning, the President made a brief, quite solemn press statement about the killing, last night, of seven Israeli children by a soldier.

968-DC-00000233



0 003593

2143

- Upon arrival in North Carolina, the President was greeted by soldiers and their families from Camp LeJeune and members of the 82nd Airborne from Ft. Bragg. He also greeted a number of school children.

The President's schedule today included a speech to the North Carolina legislature in Raleigh-Durham, at 11 a.m.

- The President departed North Carolina for Miami at 1:30 p.m.

968-DC-00000234

REDACTED

- At @ 6:30 p.m., the President proceeded to a DSCC reception and was greeted by Senator and Mrs. Bob Graham and greeted 50 people.

After the reception, he attended a dinner.



- The President then proceeded to the Sheraton Bal Harbor Hotel where he attended a Saxophone Club event.



Saturday, March 29, 1997

Daynotes...

- The President talked, today, with:

5:38 p.m.

, 9:17 p.m.

, 9:01 p.m.

, 8:32 p.m., 8:59 p.m., 9:15 p.m.

, 10:44 p.m.

11:12 a.m.

11:23 a.m.

11:51 a.m.

4:14 p.m.

968-DC-00000236

REDACTED



0 003596

2145

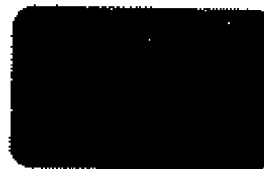
Monday, April 7, 1997

[Prime Minister Netanyahu meets w/ President today]

Oval Office morning meeting

968-DC-00000237

REDACTED



0 003597

2146

Today...

- The President did his physical therapy this morning before coming to the Oval @ 10 a.m.

His first event this morning was a drop-by of the Summit of the Americas meeting Erskine was holding, with Gen. Powell.

- The President was briefed in the Oval office by his foreign Affairs staff before his working visit this morning with PM Netanyahu.

968-DC-00000238

REDACTED



0 003598

2147

- The President greeted the Prime Minister at the doorway, via the hallway at 12 noon, and momentarily the first press pool was brought in to do photo op and press statement.

968-DC-00000239

REDACTED



0 003599

2148

Daynotes...

- The President talked, via phone, with:

, 11:39 a.m.
, 3:04 p.m.
, 8:55 p.m.
11:05 p.m.
11:37 p.m.

968-DC-00000240

REDACTED



0 003600

Wednesday, April 15, 1997

Oval Office Meeting...

- . Nancy... The President's schedule today includes a Policy Retreat tonight in the Blair House.

968-DC-00000241

REDACTED

NON-RESPONSIVE
PAGES REMOVED



0 003601

2150

REDACTED

Today...

- The President had a meeting in the residence from 10 a.m. to 11:30 a.m.
- He met with Erskine at 12 noon
- He was briefed by Sandy Berger at 12:30 p.m. for about 15 minutes.
- He met with Dan Tarullo in the Oval Office from 12:45 p.m. to 12:50 p.m.
- At 1:37 p.m., the President met with Stephanie and Nancy H.
- At 2:30 p.m., the President greeted Transportation Secretary Rodney Slater and five former Transportation secretaries in the Oval office, including: Alan Boyd, the first Transportation Secretary appointed by President Lyndon Johnson.

968-DC-00000242



0 003602

2151

- At 2:20 p.m., Betty C. called Capricia to inform her that the President was ready for the photo op with the Prescriptive Reading group.

The 21 members of the Prescriptive Partnership came into the Oval office at 2:36 p.m.

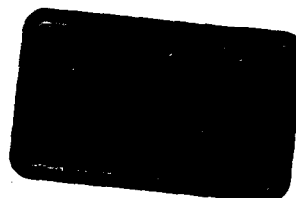
at 2:47 p.m. to brief the President

came up

968-DC-00000243

REDACTED

The President began making his phone calls at 3:03 p.m.



0 003603

2152

968-DC-00000244

REDACTED

0 003604

At 4:20 p.m.

briefed the President before the Hispanic



Caucus meeting being held in the Cabinet Meeting.

The President walked into the Cabinet room at @ 4:36 p.m., and made his way around the room, greeting the 30 or so Hispanic representatives and Congressional leaders,

The President sat down at 4:46 p.m. and opened the discussion

968-DC-00000245

REDACTED

0 003605



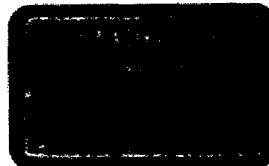
2154

- The President was briefed by his foreign policy aides before proceeding on to Blair House for the Foreign Policy Retreat.
- The President departed the Oval office at 6:17 in the Motorcade, and arrived there - across the street - at 6:20 p.m. He spent @ 10 minutes greeting the participants.

The Meeting began, in the Garden Room, at 6:30

REDACTED

968-DC-00000246



0 003606

2155

p.m.

The retreat came to an end @ 9:30

968-DC-00000247

REDACTED



0 003607

2156

The meeting ended @ 9:30 p.m. as the President walked out a reporter asked him whether the meeting was worthwhile, he responded: "Very good."

Daynotes...

- The President talked, via phone, with:
12:23 a.m.

10:19 a.m.

, 3:06 p.m.

, 4:13 p.m.

3:25 p.m.

, 3:55 p.m.

, 3:40 p.m.

3:49 p.m.

4:06 p.m.

3:44 p.m.

11:11 p.m

968-DC-00000248

REDACTED



0 003608

2157

Thursday, May 1, 1997

Oval Office Meeting...

968-DC-00000249

REDACTED

NON-RESPONSIVE
PAGES REMOVED


0 003609



Today...

- The President had physical therapy this morning from 8 to 9 a.m.
- He came to the Oval at 9:25 a.m., and met with
until 10:32 a.m

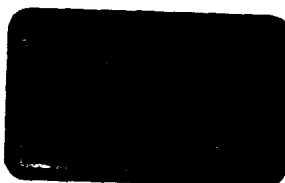
His communicators and speechwriters prepped him for the evening's speech:

At 10:35, the President met with Stephanie, his scheduler for 10 minutes.

At 10:54 a.m, the President was briefed by his press folk:

968-DC-00000250

REDACTED



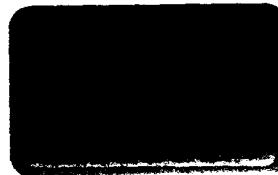
0 003610

2159

968-DC-00000251

REDACTED

- The Conference Call interviews took place in the Oval office, and lasted 14 minutes.
- The President met with Erskine for five minutes



0 003611

- From 11:44 to 12 noon, the President did an interview with CNN Spanish Radio.
- At 12:08 p.m., the President greeted Boys and Girls Club National Youth of the Year.

968-DC-00000252

REDACTED



0 003612

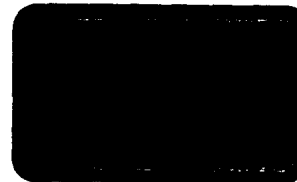
- The President and the Veep shared lunch from 12:25 to 1:18 p.m. in the Oval office Dining Room.

met with the President and Veep briefly at the end of their lunch.

- At 1:48 p.m., the President and Veep greeted family members and a few staff who gathered in the Oval for the swearing-in of Alexis Herman as Secretary of Labor.

REDACTED

968-DC-00000253



0 003613

2162

- The President met with _____ for 16 minutes in the Oval office shortly after the Swearing-in event
- At 2:25 p.m., the President met with _____ met privately with him for two minutes after
- The President called

He also attempted to call

968-DC-00000254

- The President met with

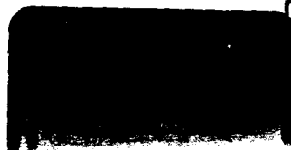
REDACTED

- The President and Mrs. Clinton departed at 7:54 p.m. for the DNC VIP reception at the DC Armory.

They arrived at the Armory @ 8:15 p.m., did a rope line with 100 people, and departed at 8:37 p.m. for the Gala.

They arrived at the Gala at 8:41 p.m.

0 003614



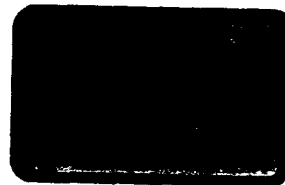
2163

They departed at 9:40 p.m., and went to the Hyatt Regency for the Saxophone Club reception,

REDACTED

The group worked a ropeline and departed the reception at 10:45 p.m. The President and Mrs. Clinton arrived back at the residence at 10:55 p.m.

968-DC-00000255



0 003615

Daynotes...

REDACTED

968-DC-00000256

The President talked, via phone, with:

10:13 a.m.

11:20 a.m.

- Conference Call:

11:25 p.m.

2:48 p.m.

3:15 p.m.

3:48 p.m.

4:03 p.m.

3:32 p.m.

3:34 p.m.

4:20 p.m.

0 003616

2165

4:34 p.m.
6:56 p.m.
7:07 p.m.
7:20 p.m.
9:47 p.m.
11:02 p.m.
11:04 p.m.
11:06 p.m.
11:29 p.m.

968-DC-00000257

REDACTED



0 003617

2166

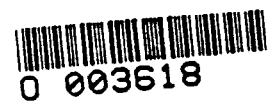
Friday, May 2, 1997

Oval Office Meeting...

968-DC-00000258

REDACTED

NON-RESPONSIVE
PAGES REMOVED



Today...

- while the President was getting his physical therapy this morning - from 7 to 8 a.m.

- At 9:15 a.m. walked over to the residence to meet with the President and give him an update on how this newly scheduled day was lining up.

REDACTED

- The President and Mrs. Clinton came down at 9:30 a.m.,
- At 9:40, the four principals walked onto the south lawn

968-DC-00000259



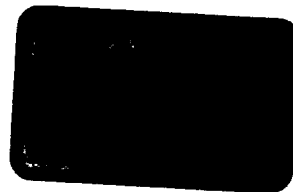
0 003619

2168

The President departed for the Dedication of the Roosevelt Memorial at 9:45 a.m., arriving there @ 9:55 a.m

REDACTED

968-DC-00000260



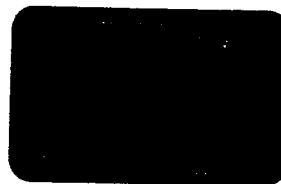
0 003620

2169

The President and entourage toured the Memorial from 11:23
to 12:22.

968-DC-00000261

REDACTED



0 003621

2170

The motorcade finally departed for the White House at 12:22 p.m.

- At 12:35 p.m.. the President came back to the Oval, and immediately into a briefing on the status of the Budget negotiations.

968-DC-00000262

REDACTED



0 003622

2171

At 4:45 p.m., the President made remarks to the Senators at the Democratic Retreat. He spoke there for 35 minutes.

The President and Vice President departed for the landing zone at 5:25 p.m.

They arrived the landing zone and departed via helicopter at 5:35 p.m.

The President arrived the White House at 6:09 p.m.

- At 6:20 p.m., the President and Mrs. Clinton arrived on the State Floor,
- The President ate dinner at 9:30 p.m., and retired at 10:30 p.m.

Daynotes...

REDACTED

968-DC-00000264

- The President ate dinner at 9:30 p.m.



0 003624

2172

The President talked. via phone, with:

5:21 p.m.

3:12 p.m.

i, 5:17 p.m.

8:07 a.m.

, 9:05 a.m.

, 8:37 a.m.

8:50 a.m.

9:15 a.m.

1:15 p.m.

1:31 p.m.

1:49 p.m.

2p.m.

6:12 p.m.

9:31 p.m.

9:27 p.m.

9:38 p.m.

10:03 p.m.

10:07 p.m.

, 10:16 p.m.

11:16 p.m.

, 10:36 p.m.

, 10:19 p.m.

10:21 p.m.

10:22 p.m.

, 10:29 p.m.

10:31 p.m.

11:03

p.m.

REDACTED

968-DC-00000265

0 003625

2173

At 11:05 a.m., the President departed the General Assembly enroute the U.S. Mission

The Bilateral Meetings
11:55 to 12:25 p.m.

The Bilateral Meeting
lasterd from 12:35 p.m. to 1:05 p.m.

The President departed the U.S. Mission enroute the United Nations at 1:05 p.m.

He attended a luncheon h
from 1:15 to 2:50 p.m.

At 3 p.m., the President departed the United Nations

The Bilateral Meeting
from 3:45 to 4:15 p.m.

968-DC-00000299

At 4:20 p.m., the President proceeded to the Presidential Suite

At 5:35 p.m., the President and Mrs. Clinton departed the Hotel for the Metropolitan Opera House

REDACTED

The Clintons departed the Metropolitan Opera at 10:10 p.m., enroute the JFK International Airport, then on to D.C.

They arrived home @ 12:25 a.m.



0 003659

Daynotes...

- The President talked, via phone, with:

8:45 a.m.

5:07, 5:16 p.m.

968-DC-00000300

REDACTED


0 003660



Saturday, October 11, 1997

Though this was supposedly a "down" day for the President, he was in the office most of the day 9:54 a.m. to 4:23 p.m.

Daynotes...

- The President talked, via phone, with:

8:59 a.m., 9:45 a.m.
 10:57 a.m.
 n, 11:13 a.m.
 11:27 a.m.
 11:46 a.m.
 12:21 p.m.
 2:34 p.m.
 2:14 p.m.
 4 p.m.
 5:42 p.m.
 8:59 p.m.

968-DC-00000301

REDACTED

0 003661

Thursday, November 13, 1997

Today...

The President arrived at the Oval office at 8:05 a.m., and had an 8:15 a.m., Foreign Policy Meeting this morning in the Cabinet Room.

At 9:15 a.m, the President made a foreign policy call

At 9:45 a.m., the President Signed the Labor/Health/HHS bill in the Oval Office.

The President golfed with Congressional leaders today from 12 noon to 4 p.m. at the Army/Navy Golf Course in Arlington (18 holes)

The President greeted 50 guests in the State Dining Room at 5:22 p.m., at a Reception for Democrats who supported the FastTrack Bill.

968-DC-00000302

REDACTED

He proceeded to the Oval at 6:34 p.m. He was briefed 1
He took a Foreign Call
at 6:47 p.m.



He returned to the residence at at 7 p.m., joined by Sandy and Mack, for a Private Dinner with Mexico President Zedillo. The President greeted President Zedillo at the South Portico and escorted him to the second floor for the dinner. [Erskine Bowles visited for five minutes, then departed]

The President joined Zedillo in the diplomatic room for his departure, at 8:45 p.m.

The President departed the White House at 9:10 p.m., for a Private Birthday party for King Hussein and Queen Noor. The President returned to the residence at 1:25 a.m.

Daynotes...

The President talked, via phone, with:

-- Conference Call

9:38 a.m.

11:10 a.m.

, 12:02 a.m.

, 12:30 a.m.

, 11:32 a.m.

, 4:44 p.m.

4:50 p.m.

4:52 p.m.

, 4:59 p.m.

, 2:47 p.m.

3:43 p.m.

REDACTED

6:30 p.m.

968-DC-00000303



0 003663

Saturday, December 6, 1997

Today...

The President spent much of the day working in the Oval office. He went there at 9:27 a.m., and remained there until 1:54 p.m. He returned to the Oval at 4:05 p.m., remaining there until 7:06 p.m.

Today's News...

REDACTED

968-DC-00000304



0 003664

2179

REDACTED

Daynotes...

The President talked, via phone, with:

968-DC-00000305

9:06 a.m.

, 11:08 a.m.

11:31 a.m.

12:48 p.m.

5:06 p.m.

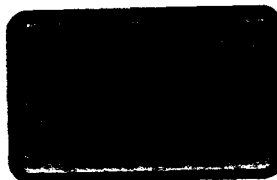


2180

7:58 a.m.
5:08 p.m.
4:35 p.m.
5:05 p.m.

REDACTED

968-DC-00000306



0 003666

Monday, December 15, 1997

Today...

The President met this morning with Erskine and Sylvia in the Oval at 9:17 a.m., for 11 minutes

At 9:31 a.m., he had national security briefing.

Then, at 9:46 a.m., the group was joined

At 9:58 p.m., the President welcomed Prime Minister Ahern into the Oval office.

At 10:51 a.m., the President escorted Prime Minister Ahern to the West Lobby door.

At 10:57 a.m., the President proceeded to the Cabinet Room for a Foreign Policy meeting

The group met until 11:59 a.m.

At 12:09 p.m., the President was briefed

He greeted Bill Lann Lee and his family at 12:32 p.m.,

REDACTED

968-DC-00000307



2182

968-DC-00000308

REDACTED

The President met briefly with the Lee family after the event.

At 1:23 p.m., he met with Senator Leahy in the Dining room.

He met in the Oval office with Stephanie on his week's schedule, with Podesta.

The President did office work from 1:23 to 4:35 p.m., then went to the residence at 4:36 p.m.

At 5:17 p.m., the President proceeded to the first press



2183

reception of the evening in the Diplomatic Reception Room. There

He proceeded to the second press reception at @ 9 p.m.

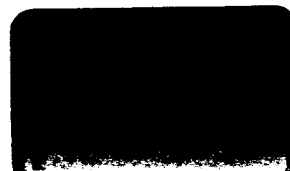
Daynotes...

The President talked, via phone, with:

4:04 p.m.
4:08 p.m.
10:56 p.m.
11:37 p.m.

REDACTED

968-DC-00000309



0 003669

Sunday, December 28, 1997

Today's News...

Today...

The President and Mrs. Clinton attended Foundry United Methodist Church in Washington.

Daynotes...

The President talked, via phone, with:

. 9:40 a.m.
, 10:42 a.m.
10:46 a.m.
, 2:19 p.m.
6:57 p.m.

REDACTED

968-DC-00000310



0 003670

REDACTED

0 003626

- The President spent most of his "day off" at the Oval office working, except for two hours he spent with Roger on the WH putting green - from 2:30 to 5 p.m.
- Ian came at 6:05 for a Presidential hair cut.
- The Clinton ate dinner at 7 p.m.
- He talked, via phone, with:
 - , 5:59 p.m.
 - , 9:58 p.m.
 - , 6:30 p.m.
- The President watched a movie in the family theatre from 7:55 to 9:27 p.m.

2186

Friday, May 30, 1997

- The President talked, via phone, with:

, 6:18 p.m.
7:42 p.m.
9:01 p.m.
9:16 p.m.

968-DC-00000267

REDACTED



0 003627

2187

Wednesday, June 11, 1997

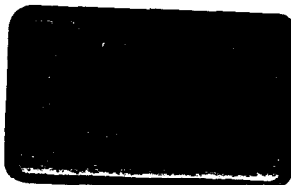
Oval Office Meeting...

968-DC-00000268

REDACTED

NON-RESPONSIVE
PAGES REMOVED


0 003628



Today...

- The President walked into the Oval about 9:13 a.m.,
- At 9:33, he was briefed by Sandy on world affairs,
- Hamad Bin Khalifa Al Thani, Amir of Qatar, was escorted into the Oval office at 9:48 a.m.

This meeting lasted for 38 minutes, until 10:26 a.m.

- He was briefed for 8 minutes by Lorrie McHugh and Rahm for the upcoming conference call interview with Susan Page of USA Today.

The President's interview with Susan Page lasted from 10:55 a.m. to 11:05

The President signed the Juvenile Justice Executive Order he would be announcing today in the Oval at 11:28.

Rahm, briefed the President on the upcoming Juvenile Justice event at Georgetown from 11:30 to 11:44 a.m. in the Oval.

He departed the White House for Georgetown University at 11:48 a.m.

REDACTED

968-DC-00000269



- The President departed Georgetown University via motorcade at 12:34 p.m., arriving back at the White House at 12:43 p.m. He sent word to Nancy H. that he would remain at the residence until @ 3p.m. He, in fact, returned to the Oval at 4:05 p.m.
- From 4:08 p.m. to 4:13 p.m., he visited with , long time friends, in the Oval.

At 4:15, the President was briefed for his upcoming interviews (

The Frisbee interview was a conference call interview, and lasted from 4:33 to 5:05 p.m.

The second interview was with the Trotter Group and lasted from 5:11 p.m. to 6:21 p.m.

At 6:28 p.m. the President was briefed

The Congressional meeting took place in the Yellow Oval Room, and lasted from 6:58 p.m. to 8:11 p.m.

- The President departed the residence at 8:14 p.m. for the Mayflower Hotel, where a Democratic National Committee Dinner was being held.

REDACTED

968-DC-00000270



2190

The President and Veep sat in on a discussion with participants. This lasted for @ an hour, when the President greeted the participants, and departed for the residence at 10:32 p.m. He arrived home at 10:36 p.m.

Daynotes...

968-DC-00000271

- The President spoke, via phone, with:

10:40 p.m.

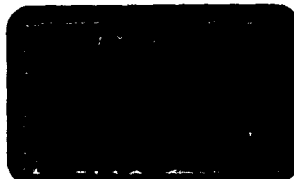
10:53 p.m.

- Conference Call
- Conference Call

10:54 a.m.

WSJ, 4:33 p.m.

REDACTED



2191

Monday, June 16, 1997

Oval Office Meeting...

968-DC-00000272

REDACTED

NON-RESPONSIVE
PAGES REMOVED



0 003632

REDACTED

Today...

- The President was "down" most of the day. He did his Physical therapy this morning @ 10:30 to 11:45 p.m.
- The President greeted 25 US Open Golf participants at a tea in the WH residence today at 1:05 p.m.
- Today, at 5:30 p.m., the President came over to the Oval. He did five video tapings in the Roosevelt room,
- The President putted on the south lawn for @ 15 minutes before he left for the Gary Mauro booksigning party.
- He departed the White House at 6:52 p.m., for a booksigning



0 003633

2193

reception for Gary Mauro at the Willard Hotel.

He departed the party at 7:24 p.m. enroute the Sheraton Carlton Hotel, where he addressed the DNC African American leadership Dinner

968-DC-00000274

REDACTED



0 003634

2194

From there, the President proceeded to the Hay Adams hotel, to participate in another DNC dinner, and to thank the Jewish American leadership for their support in 1996.

Daynotes...

REDACTED

- The President talked, via phone, with:

11:24 a.m.

12:27 p.m.

968-DC-00000275


0 003635

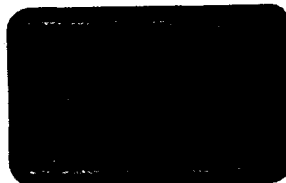


2195

, 3:18 p.m.

968-DC-00000276

REDACTED



0 003636

2196

Tuesday, June 24, 1997

Oval Office meeting...

968-DC-00000277

REDACTED



2197

968-DC-00000278

Daynotes...

REDACTED

- The President came by the Oval at 3:55 p.m., and was there for @ an hour before departing for the Army Navy Country Club in Arlington to play golf.
He was at the country club from 5:16 p.m., to 7:50 p.m. Upon his return, he told reporters his golf game was "rusty."
- The President, Mrs. Clinton and a guest ate dinner at the pool at 8:12 p.m.
- The President talked, via phone, with:
12:49 p.m.



0 003638

2198

1 p.m.
1:28 p.m.
1:17 p.m.
8:22 p.m.
9:34 p.m.
10:15 p.m.
10:38 p.m.

REDACTED

968-DC-00000279



0 003639

Friday, July 4, 1937

- The President proceeded to the Oval at 8:40 a.m.
He made a conference call
at 11:36 a.m. - and talked for 12 minutes.
Shortly after his phone call, the President went outside to the putting green. At 12 noon, he joined Mrs. Clinton at the pool then returned to the residence at 3:15 p.m.

He returned to the Oval at 3:18 p.m., remaining there until 6:58 p.m. He talked at 5:28 p.m., then proceeded to the residence. He ate dinner with Mrs. Clinton at 7:55 p.m. before their departure for Spain.

After dinner, the First couple went out onto the south portico, where they greeted this year's 4th of July Celebration visitors

The President and Mrs. Clinton actually departed the White House for Spain at 11:25 p.m.

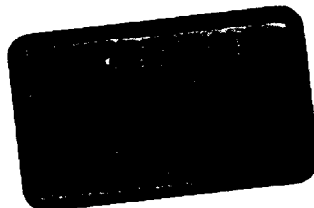
Daynotes...

- The President talked, via phone, with:

10:22 a.m.
10:25 a.m.
10:37 a.m.
10:51 a.m.
3:45 p.m.
4:43 p.m.
6:29 p.m.
8:54 p.m.

968-DC-00000280

REDACTED



0 003640

2200

Monday, July 14, 1997

The President had the morning "off," but made a very important announcement, and released a report this afternoon about genetic screening.

Today...

At 2:28 p.m., the President and Veep proceeded to the Red Room to greet program participants

968-DC-00000281

REDACTED

NON-RESPONSIVE
PAGES REMOVED



0 003641

2201

968-DC-00000282

REDACTED

The event ended at 3:03 p.m., and the President was down for
the rest of the day



0 003642

Daynotes...

- The President talked, via telephone, with:

, 12:24 p.m.

, 12:56 p.m.

, 8:24 p.m.

, 9:30 p.m.

- Conference Call

10:55 p.m.

968-DC-00000283

REDACTED



0 003643

Wednesday, July 16, 1997

Today...

- The President arrived at the Oval at 8:30 a.m., and completed his physical therapy at the pool.

He actually arrived at the south portico, for his 9 a.m., photo event with the interns two minutes early!

At 9:35 a.m., the President met with Erskine, Sylvia in the Oval.

At 10:05, he met with Mark Erwin for 17 minutes.

He then read over his remarks for @ 20 minutes, then did his NSC briefing with _____ at 10:49 a.m.

He met with Chuck Ruff in the Oval at 11:10 a.m., for 10 minutes as a pre-brief for the Walter Dellinger meeting.

At 11:41 a.m., the President met with General Joulwan in the Oval office. Sandy joined the two.

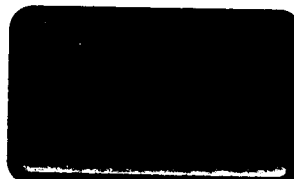
At 11:53 a.m., the President proceeded to the Veep's Ceremonial office in the OEOB, to sit in on his E-Chip Meeting.

They proceeded to Room 450 OEOB at 12:25 p.m., for the E-Chip Event.

968-DC-00000284

REDACTED

NON-RESPONSIVE
PAGES REMOVED



At 12:58 p.m., the President proceeded to the Oval office, and at 1:05 p.m. had lunch with the Veep in the Oval office.

At 1:45 p.m., the President met

in Don Kerrick's office.

The President's next meeting was at 6:30 in the residence -

Daynotes...

REDACTED

968-DC-00000285



0 003645

2205

- The President visited Cashion's Eat Place - a local Restaurant in Adam's Morgan,

they dined from 8:17 p.m. until 10:30 p.m.

- The President talked, via phone, with:

, 9:10 a.m.

3:32 p.m.

, 4:16 p.m.

4:34 p.m.

, 4:32 p.m.

, 5:21 p.m.

6:46 p.m.

, 7:48 p.m.

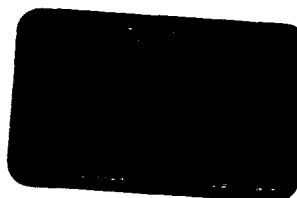
10:46 p.m.

, 5:16, 6:04 p.m.

10:31 p.m.

968-DC-00000286

REDACTED



0 003646

Thursday, July 24, 1997

Today...

The President arrived at the Oval office at 9:20 a.m., and returned to the Yellow Oval room for the Congressional meeting -

The President returned to the Oval office at 11:45 a.m. to greet President Herzog. The delegation then proceeded to the Old Family dining room for a luncheon for the foreign delegation. The luncheon concluded at 1:25 p.m., and the President and Mr. Herzog proceeded to the ground floor and said their goodbyes.

- The President, accompanied by the Veep, greeted guests in the Green room for the Climate Change event, including nobel laureates and academicians.

At 2:30 p.m., the President and Veep proceeded to the East Room where they participated in an hour-long climate change event. (10

~~The President proceeded to the Oval office at 4:45 p.m., remaining there until 7 p.m. when he and Mrs. Clinton went to the Picasso exhibition and dinner.~~

The President and Mrs. Clinton returned to the residence at 10:30 p.m.

Daynotes...

- The President talked, via phone, with:

8:38 a.m.

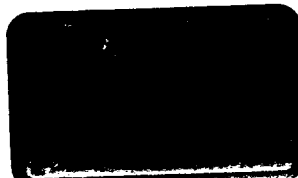
9:03 a.m.

11:43 a.m.

REDACTED

968-DC-00000287


0 003647



Saturday, August 16, 1997

- The President played 18 holes of golf at Belle Haven Golf Course in Alexandria, VA. He played from 11:11 a.m. to 5:00 p.m., and was joined by White House aide Mark ... and ... friends: Lee Williams and Kit Ashby. The three returned to the residence at 5:22 p.m.

The President joined Mrs. Clinton at the pool at 5:20 p.m., where the First couple ate dinner at 6:00 p.m.

- The President talked, via phone, with:

, 9:18 a.m.

, 9:05 p.m.

, 7 p.m.

9:01 p.m.

, 9:04 p.m.

, 10:33 p.m.

10:35 p.m.

10:49 p.m.

11:40 a.m.

- The Clintons retired at 11:00 p.m.

REDACTED

968-DC-00000288



0 003648

Thursday, September 11, 1997

968-DC-00000289

REDACTED

Today...

- The President arrived at the Oval @10:15 a.m., this morning and met with John Podesta from 10:17 to 10:27 a.m. He was then joined by Sandy Berger, to make a Conference call to Canada Prime Minister Chretien. They talked for @ 10 minutes.

At 11:10 a.m., the President was briefed by Katie McGinty, et al, on the American Rivers Heritage event

The President walked to OEOB at 11:18 a.m, and greeted



0 003649

2209

Immediately after the event in the OEOB, the President returned to the Oval office, where he did photo opportunities with @ 20 "Friends of Mount Vernon,"

The President lunched with the Veep in the Oval from 12:45 to 1:45 p.m.

The President met with Columbian author Gabriel Garcia Marquez in the Oval office from 1:36 p.m. to 2:42 p.m.

968-DC-00000290

REDACTED



0 003650

The President met with Eskine and Sylvia briefly at 2:46 p.m. before walking over to the residence,

The President had two unscheduled meetings this evening before he walked over to the residence for the rescheduled Congressional Picnic/reception (since it was held inside the residence, not the south lawn.)

He met from 6:21 to 6:58 p.m. and a
meeting from 6:59 to 7:13
p.m.

The congressional reception was scheduled for 7:30 to 8:30 p.m, but the President kept it going for another hour.

Daynotes...

- The President talked, via phone, with:

, 10:02 a.m.
6:26 p.m.

968-DC-00000291

6:35 p.m.

- Conference Call

10:34 a.m.

REDACTED


0 003651

Friday, September 12, 1997

Today...

The President had a dental appointment in the residence at 8:30 a.m. this morning; and made it to the office at 9:30 a.m.

His first meeting this morning was with John Podesta and Sylvia, starting at 9:33 a.m.

He met with Sandy briefly for his NSC briefing before his meeting with Hong Kong, SAR Chief Executive C.H. Tung.

@ 11 a.m., the President went to the Yellow Oval Room in the residence for his Congressional meeting

968-DC-00000292

REDACTED

NON-RESPONSIVE
PAGES REMOVED

At 12 a.m., the President met with Stephanie Streett on his



0 003652

week's schedule,

At 12:05 p.m., the President met

At 1 p.m., the President announced the new Surgeon General in the Oval office.

REDACTED

968-DC-00000293



0 003653

- From 1:58 to 2:10 p.m., the President taped 10 video messages in the Roosevelt Room.

After the tapings, the President met with
from 3:40 to 3:55 p.m.

He met with Erskine, briefly alone for three minutes.

- From 5 to 5:50 p.m., the President met with the Tobacco group in the Cabinet meeting.
- The President's radio address was on Campaign Reform. It was taped in the Roosevelt Room at 6:35 p.m., in front of one of the smallest audiences for the taping in a while - 35 people.
- The President talked, via phone, with:

968-DC-00000294

1. 4:51 p.m.

2. 7:05 p.m.

3. 7:05 p.m.

4. 7:27, 7:50, 7:53 p.m.

5. 8:23 p.m.

6. 9:22, 9:46 p.m.

REDACTED

- The President ate dinner at 8 a.m.
- He watched "G.I. Jane" in the family theatre at 9:05 p.m.,



Monday, September 22, 1997

The President was in New York today, to make an U.N. address before the 52nd Session of the United Nations General Assembly. He also meets with UN Sec. Koffi Annan, does the Met Opera's debut of "Carmen," then returns - after 12 midnight - to the White House.

Erskine's morning meeting...

The President and Mrs. Clinton is in New York. He will meet with Kofi Annan this morning, then do the UN General Assembly Address. He has two bilaterals this morning: Pakistan and Russia. He has a luncheon at the U.N., then another bilateral with India.

The President and Mrs. Clinton will attend the Metro Opera at 5:30 p.m.

968-DC-00000295

NON-RESPONSIVE
PAGES REMOVED

REDACTED



0 003655

2215

968-DC-00000296

Sylvia's 8:30 meeting...

REDACTED



0 003656

2216

Today...

The President was briefed this morning in the Presidential Suite of the Waldorf Astoria,

At 9:15 a.m., he departed the Waldorf for the United Nations.

968-DC-00000297

REDACTED



0 003657

At 9:45 a.m., the President met with Foreign Minister Udovenko of the Ukraine (same WH/Administration participants.)

At 10:45 a.m., the President arrived the General Assembly of the United Nations, and was escorted to his seat by Ambassador Muzi-Falconi.

He was invited to address the General Assembly, and proceeded to speak for the next 19 minutes:

968-DC-00000298

REDACTED


0 003658

2218

At 11:05 a.m., the President departed the General Assembly enroute the U.S. Mission

The Bilateral Meetings
11:55 to 12:25 p.m.

The Bilateral Meeting
lasted from 12:35 p.m. to 1:05 p.m.

The President departed the U.S. Mission enroute the United Nations at 1:05 p.m.

He attended a luncheon
from 1:15 to 2:50 p.m.

At 3 p.m., the President departed the United Nations

968-DC-00000299

The Bilateral Meeting
from 3:45 to 4:15 p.m.

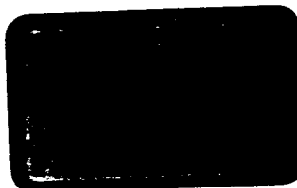
At 4:20 p.m., the President proceeded to the Presidential Suite

At 5:35 p.m., the President and Mrs. Clinton departed the Hotel for the Metropolitan Opera House

REDACTED

The Clintons departed the Metropolitan Opera at 10:10 p.m., enroute the JFK International Airport, then on to D.C.

They arrived home @ 12:25 a.m.



0 003659

Daynotes...

- The President talked, via phone, with:

8:45 a.m.

5:07, 5:16 p.m.

968-DC-00000300

REDACTED


0 003660



Saturday, October 11, 1997

Though this was supposedly a "down" day for the President, he was in the office most of the day 9:54 a.m. to 4:23 p.m.

Daynotes...

- The President talked, via phone, with:

8:59 a.m., 9:45 a.m.
 10:57 a.m.
 n, 11:13 a.m.
 11:27 a.m. 11:46 a.m.
 12:21 p.m.
 -, 2:34 p.m.
 -, 2:14 p.m.
 4 p.m.
 , 5:42 p.m.
 8:59 p.m.

968-DC-00000301

REDACTED



2221

Thursday, November 13, 1997

Today...

The President arrived at the Oval office at 8:05 a.m., and had an 8:15 a.m., Foreign Policy Meeting this morning in the Cabinet Room.

At 9:15 a.m, the President made a foreign policy call

At 9:45 a.m., the President Signed the Labor/Health/HHS bill in the Oval Office.

The President golfed with Congressional leaders today from 12 noon to 4 p.m. at the Army/Navy Golf Course in Arlington (18 holes)

The President greeted 50 guests in the State Dining Room at 5:22 p.m., at a Reception for Democrats who supported the FastTrack Bill.

968-DC-00000302

REDACTED

He proceeded to the Oval at 6:34 p.m. He was briefed |
He took a Foreign Call
at 6:47 p.m.



0 003662

He returned to the residence at at 7 p.m., joined by Sandy and Mack, for a Private Dinner with Mexico President Zedillo. The President greeted President Zedillo at the South Portico and escorted him to the second floor for the dinner. [Eskine Bowles visited for five minutes, then departed]

The President joined Zedillo in the diplomatic room for his departure, at 8:45 p.m.

The President departed the White House at 9:10 p.m., for a Private Birthday party for King Hussein and Queen Noor. The President returned to the residence at 1:25 a.m.

Daynotes...

The President talked, via phone, with:

-- Conference Call

9:38 a.m.

11:10 a.m.

, 12:02 a.m.

, 12:30 a.m.

, 11:32 a.m.

, 4:44 p.m.

4:50 p.m.

4:52 p.m.

, 4:59 p.m.

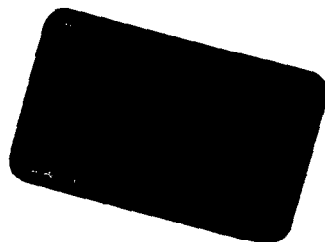
, 2:47 p.m.

3:43 p.m.

REDACTED

6:30 p.m.

968-DC-00000303



0 003663

2223

Saturday, December 6, 1997

Today...

The President spent much of the day working in the Oval office. He went there at 9:27 a.m., and remained there until 1:54 p.m. He returned to the Oval at 4:05 p.m., remaining there until 7:06 p.m.

Today's News...

REDACTED

968-DC-00000304



0 003664

2224

REDACTED

Daynotes...

The President talked, via phone, with:

968-DC-00000305

9:06 a.m.

11:08 a.m.

11:31 a.m.

12:48 p.m.

5:06 p.m.

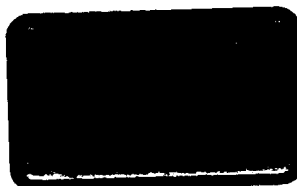


2225

7:59 a.m.
5:08 p.m. 4:35 p.m.
5:05 p.m.

REDACTED

968-DC-00000306



0 003666

Monday, December 15, 1997

Today...

The President met this morning with Erskine and Sylvia in the Oval at 9:17 a.m., for 11 minutes

At 9:31 a.m., he had national security briefing.

Then, at 9:46 a.m., the group was joined

At 9:58 p.m., the President welcomed Prime Minister Ahern into the Oval office.

At 10:51 a.m., the President escorted Prime Minister Ahern to the West Lobby door.

At 10:57 a.m., the President proceeded to the Cabinet Room for a Foreign Policy meeting

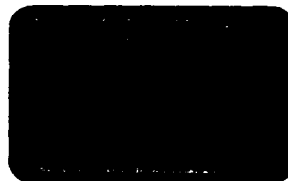
The group met until 11:59 a.m.

At 12:09 p.m., the President was briefed

He greeted Bill Lann Lee and his family at 12:32 p.m.,

REDACTED

968-DC-00000307



2227

968-DC-00000308

REDACTED

The President met briefly with the Lee family after the event.

At 1:23 p.m., he met with Senator Leahy in the Dining room.

He met in the Oval office with Stephanie on his week's schedule, with Podesta.

The President did office work from 1:23 to 4:35 p.m., then went to the residence at 4:36 p.m.

At 5:17 p.m., the President proceeded to the first press



reception of the evening in the Diplomatic Reception Room. There

He proceeded to the second press reception at @ 9 p.m.

Daynotes...

The President talked, via phone, with:

4:04 p.m.
4:08 p.m.
10:56 p.m.
11:37 p.m.

REDACTED

968-DC-00000309



0 003669

2229

Sunday, December 28, 1997

Today's News...

Today...

The President and Mrs. Clinton attended Foundry United Methodist Church in Washington.

Daynotes...

The President talked, via phone, with:

9:40 a.m.
10:42 a.m.
10:46 a.m.
2:19 p.m.
6:57 p.m.

REDACTED

968-DC-00000310



0 003670

2230

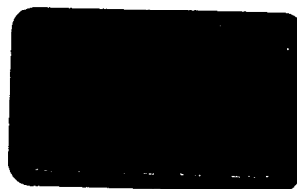
THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 15th, 19 97

TIME		NAME	ACTION
PLACED	DISC		
OUT	ARR	MS. BETTY W. CURRIE	TLKD-OK 10:56 P.M.
INC	10:56 PM	RES: [REDACTED]	
OUT	10:58 AM	[REDACTED]	

V006-DC-00002061



REDACTED



2231

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG
SIGNAL SWITCHBOARD

January 9, 1998

TIME		NAME	ACTION
PLACED	DISC		

OUT	AM		Ms. Betty W. Currie Office, Washington, D.C. White House Signal [REDACTED]	Tlkd-ok 5:08 PM
XXX	5:07 PM	5:09		
XXX	AM		Ms. Betty W. Currie The Oval Office White House Signal [REDACTED]	Tlkd-ok 5:12 PM
INC	5:12 PM	5:13		

V006-DC-00002064

REDACTED




HB 003063

THE WHITE HOUSE
WASHINGTON, D.C.

JUNE 14, 1996

1:46 a.m. FRIDAY

9:25 9:34

6:00 6:01 R The President talked with

6:06 6:07 R The President talked with

7:05 P The President telephoned

7:30. R The President was telephoned by

10:33 10:40

V006-DC-00002073

REDACTED



HB 003072

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/7/98

TIMOTHY JOHN KEATING, white male, born [REDACTED], [REDACTED], Social Security Account Number [REDACTED], home address [REDACTED], telephone [REDACTED] was interviewed in the office of Attorney JAMES HAMILTON of the firm of Swindler & Berlin, 3000 K Street, N.W., Suite 300, telephone [REDACTED], who was present throughout the interview.

After being advised of the personal and official identities of the interviewers and the purpose of the interview, KEATING provided the following information:

KEATING is currently employed as Vice President and Partner, Timmons and Company, 1850 K Street, N.W., Washington, D.C., office telephone [REDACTED], cell phone [REDACTED].

From January of 1993 through March of 1996 and from November of 1996 through March of 1997, KEATING was employed as Special Assistant to the President and Staff Director of Legislative Affairs with an office in the West Wing of the White House, second floor, telephone [REDACTED]. From April of 1996 through October of 1996, KEATING was assigned to work on the Democratic National Convention.

KEATING first became aware of MONICA LEWINSKY in about early November of 1995. There was an opening in the Congressional Correspondence Section at Legislative Affairs. LEWINSKY was brought to KEATING's attention by ASHLEY RAINES, Special Liaison to Management and Administration, as a bright young intern working in the Chief of Staff's Office, who RAINES thought would do well in KEATING's office.

KEATING followed up on RAINES' suggestion and interviewed LEWINSKY. LEWINSKY was also recommended by JENNIFER PALMIERI and LEON PANETTA. KEATING hired LEWINSKY to work in the Congressional Correspondence Section of Legislative Affairs.

LEWINSKY initially performed well in the job but spent too much time out of the office and not enough time doing what she should have been doing. The Congressional Correspondence Section was only a two-person office supervised by JOCELYN JOLLEY. Since it was such a small office with a large volume of

Investigation on 2/6/98 at Washington, D.C. File # 29D-LR-35063

by [REDACTED] Date dictated 2/7/98



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Continuation of OIC-302 of TIMOTHY JOHN KEATING . On 2/6/98 . Page 2

work, everyone needed to work hard.

LEWINSKY was frequently away from her desk. When questioned about these absences, LEWINSKY would have a ready excuse, such as, delivering a letter to the Old Executive Office Building, the West Wing of the White House, or an unscheduled but necessary trip to "the Hill." KEATING described LEWINSKY's work habits as having "poor time management."

KEATING could not recall any specific disciplinary problems and LEWINSKY was never given a written reprimand; however, LEWINSKY was given a few verbal reprimands and counseled about her lack of proper time management.

KEATING gave an example of LEWINSKY's poor time management as when LEWINSKY would deliver a single piece of correspondence rather than waiting until several pieces of correspondence had accumulated for delivery to a distant location.

As mentioned above, JOLLEY and LEWINSKY were the only people working in the Congressional Correspondence Section of the Legislative Affairs Office. There were other Legislative Affairs employees working in the East Wing near the Congressional Correspondence Section. KEATING identified these employees as JANET MURGUIA, assigned as House Liaison; TRACY THORNTON, Senate Liaison; BARBARA CHOW, Senate Liaison; LUCIA WYMAN, House Liaison; ANN JOHNSON, Staff Assistant; ANN CATTALINI, Staff Assistant; and six to eight, short-term interns working in various locations throughout the Legislative Affairs Office.

KEATING was not aware of any of LEWINSKY's co-workers in Legislative Affairs who could be considered a close friend of LEWINSKY. KEATING was also not aware of any one in the White House who could be considered a close friend of LEWINSKY with the possible exception of ASHLEY RAINES.

KEATING did not have a personal relationship with LEWINSKY and LEWINSKY never told KEATING of having a sexual affair with anyone in the White House or anywhere else. KEATING has never heard rumors or gossip about LEWINSKY having a sexual affair with anyone in the White House.

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Continuation of OIC-302 of TIMOTHY JOHN KEATING, On 2/6/98, Page 3

KEATING is aware of why LEWINSKY and JOLLEY were both moved out of the Congressional Correspondence Section. KEATING described the work in the Congressional Correspondence Section as being very demanding and stressful, with short "turn-around" times on responding to the many letters relating to Legislative Affairs. Both LEWINSKY and [REDACTED] were "in over their heads." LEWINSKY did not appear to be able to make the transition from an intern to a staff member, and handle the resulting work pressure.

The final incident which caused both JOLLEY and LEWINSKY to be moved from Congressional Correspondence was when they took a large "batch" of correspondence to the Office of Management and Budget, some of which were up to six months old, and demanded that the Office of Management and Budget prepare immediate responses.

The incident was reported to JODIE TORKELESON, Director of the Office of Administration, who took the matter to EVELYN LIBBERMAN, Deputy Chief of Staff, who brought the matter to KEATING's attention.

In addition, LIBBERMAN called to KEATING's attention that LIBBERMAN had observed LEWINSKY on several occasions walking around the West Wing, seemingly trying to observe the President or other high officials and get in a "photo-op."

The collective decision was made to move both JOLLEY and LEWINSKY from the Congressional Correspondence Section to a less demanding position elsewhere in the government.

KEATING contacted both BOB NASH, Director, and PATSY THOMASSON, Deputy Director, Presidential Personnel Office, and discussed with both of them the possibility of relocating both [REDACTED] and LEWINSKY.

[REDACTED] was found a position at General Services Administration and LEWINSKY was placed in the Department of Defense at the Pentagon by the Presidential Personnel Office.

After LEWINSKY's transfer to the Pentagon, KEATING did see LEWINSKY at the White House on a few occasions. KEATING recalled seeing LEWINSKY at a "Welcome Home" party at the White House just after the 1996 election. KEATING also recalled seeing

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Continuation of OIC-302 of TIMOTHY JOHN KEATING, On 2/6/98, Page 4

LEWINSKY in the West Wing; near the Staff Mess; and on the driveway near the White House. KEATING has not seen LEWINSKY in the area of the Oval Office.

KEATING spoke to LEWINSKY on these occasions but never inquired as to LEWINSKY's reason for being at the White House.

KEATING has no knowledge of the President visiting the Congressional Correspondence Section while LEWINSKY worked there. KEATING explained the Oval Office is located in the West Wing while the Congressional Correspondence Section is located in the East Wing. The two offices are some distance apart. KEATING felt certain that staff members would have made him aware of any visits by the President.

KEATING has talked to no one other than family members and his attorney about today's interview. KEATING did meet last evening with HAROLD ICKES for drinks and mentioned to ICKES that he was being interviewed today. There was no discussion of what the interview was to be about; what KEATING was going to say; nor did ICKES indicate to KEATING what KEATING should say during the interview.

Timothy Keating, 2/25/98

Grand Jury

Page 1 to Page 113

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
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Page 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 4
United States District Court
for the District of Columbia
Third & Constitution, N.W.
Washington, D.C. 20001
Wednesday, February 25, 1998The testimony of TIMOTHY JOHN KEATING was taken in
the presence of a full quorum of Grand Jury 97-2, impaneled
on September 19, 1997, commencing at 12:03 p.m., before:SOLOMON WISENBERG
MARY ANNE WIRTH
DAVID BARGER
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

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understand that?

A Yes, sir.

Q If you have retained counsel, he or she can't
be in here with you, but the Grand Jury will permit you
a reasonable opportunity to step outside the Grand Jury
room to consult with counsel, if you desire. Do you
understand that?

A Yes, sir.

Q Your counsel is outside; is that correct?

A That is correct, sir.

Q What is your counsel's name?

A Jim Hamilton.

Q We're all bound by an oath of secrecy -- myself,
the grand jurors, Ms. Wirth, the Grand Jury court reporter
-- with certain exceptions that I'll get into. Do you
understand that?

A Yes, sir.

Q You are not bound by any oath of secrecy. Do you

understand that?

A Yes, sir.

Q You can talk to anybody you want to about your
appearance, or not talk to them at all. That's between you
and your attorney. Do you understand that?

A Yes, sir.

Q Now, I'll tell you about some of the exceptions to

Page 2

Whereupon,

TIMOTHY JOHN KEATING

was called as a witness and, after being first duly sworn by
the Deputy Foreperson of the Grand Jury, was examined and
testified as follows:

EXAMINATION

BY MR. WISENBERG:

Q Could you state your name for the grand jurors,
please.

A Timothy John Keating.

Q And could you spell your last name.

A Certainly. K-e-a-t-i-n-g.

Q Mr. Keating, my name is Sol Wisenberg. We met out
in the hallway yesterday; is that correct?

A That is correct, sir.

MR. WISENBERG: And I'm here with my colleague,
Mary Anne Wirth. We're both with the Office of Independent
Counsel.And these are the grand jurors, and this is the
Grand Jury court reporter.Let the record reflect that we have a quorum, and
there are no unauthorized persons in the Grand Jury room.

That's correct, is it not?

DEPUTY FOREPERSON: Yes, it is.

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our oath of secrecy.

As a example, if there was to ever be a trial
resulting from our investigation, and you got up at trial
and testified, and you said something different than what you
said here today, we could use your Grand Jury transcript --
anybody could -- to say, "Mr. Keating testified differently
in Grand Jury." Do you understand that?

A Yes, sir.

Q Another example would be we have FBI agents who
help us in our investigation. They get to know what goes on
inside the Grand Jury. Do you understand that?

A Yes, sir.

Q They are also bound by an oath of secrecy, but they
get to know what goes on. Do you understand that?

A Yes, sir, I do.

Q Independent counsel, under certain circumstances,
with a court order -- when and if the independent counsel
makes his or her report to the House of Representatives,
with the proper court order, independent counsels can reveal
certain things that happen in front of the Grand Jury. Do
you understand that?

A Yes, sir, I do.

Q All right. There are three kinds of witness who
come in front of the Grand Jury -- witnesses, subjects,
and targets.

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BY MR. WISENBERG:

Q Before we start, I'm going to briefly talk about
our authority and your rights and responsibilities as a
Grand Jury witness.

A Okay, sir.

Q I'll occasionally ask you if you understand
something I've read to you, and I'll need a audible
response --

A Okay.

Q -- a "Yes," a "No," a "Maybe," so that the
Grand Jury court reporter can pick it up. She can't pick up
"Un-un," "Uh-huh," or shakes of the head. Understand?

A Yes, sir.

Q Okay. This is a federal Grand Jury impaneled
by a United States District Court judge here conducting
an investigation of possible violations of federal criminal
laws involving possible perjury, obstruction of justice, and
subornation of perjury. Do you understand?

A Yes, sir.

Q You may refuse to answer any question, if a
truthful answer to that question would tend to incriminate
you. Do you understand that?

A Yes, sir.

Q Anything that you do say may be used against you by
the Grand Jury or in a later legal proceeding. Do you

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A target is somebody who the Grand Jury and the
prosecutor think it's more likely than not that they're going
to indict. Do you understand that definition?

A Yes, sir.

Q You are not a target. Do you understand that?

A Yes, sir.

Q A subject is somebody who's not at target status,
but the prosecutor and grand jurors have questions about
their behavior. Do you understand that definition?

A Yes, sir.

Q You are not a subject. Do you understand that?

A Yes, sir.

Q A witness is somebody who has information that is
within the Grand Jury's jurisdiction to inquire about. Do
you understand that definition?

A Yes, sir.

Q You are a witness. Do you understand that?

A Yes, sir.

Q Do you understand we can't guarantee you you'll
never be a subject or a target?

A Yes, sir.

Q All right. You're here pursuant to subpoena; is
that correct?

A That's correct, sir.

Q Did you bring any documents with you?

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[1] A No, sir.
 [2] Q Okay. Your attorney handed me a statement
 [3] yesterday.
 [4] A Yes, sir.
 [5] Q Do you have a copy of that statement with you?
 [6] A I do not. I --
 [7] Q It's basically a statement to the effect that at
 [8] one time after Monica Lewinsky got -- after you sent her
 [9] over, or helped send her over to the Pentagon, that she sent
 [10] you a letter complaining about it, is that correct?
 [11] A It was more than that. I mean, it was a letter,
 [12] you know, asking to come back.
 [13] Q Okay.
 [14] A It was -- you know, it was a plea come to back.
 [15] Q Okay. We'll get into that later.
 [16] A Yes, sir.
 [17] Q But the point is, as I understand it -- you correct
 [18] me if I'm wrong -- you got rid of that letter and, as far as
 [19] you know, it doesn't exist anymore.
 [20] A As far as I know, it does not exist anymore.
 [21] Q Was it a handwritten note?
 [22] A It was handwritten.
 [23] Q Okay. You know that you can't lie to us.
 [24] A Yes, sir.
 [25] Q All right. If you lie, that's perjury, and that's

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[1] A No, sir.
 [2] Q Okay. Before there -- before -- that's ACLI
 [3] it's called?
 [4] A Yes, sir, ACLI.
 [5] Q Before there?
 [6] A I was at the White House.
 [7] Q What was your job at the White House?
 [8] A Special assistant to the President and staff
 [9] director for legislative affairs.
 [10] Q All right. Within legislative affairs, what level
 [11] is staff director? I mean, number one person? Number two
 [12] person? Number three person?
 [13] A There's -- the White House is in tiers. Assistant
 [14] to the President is the top tier. Then there's a deputy
 [15] assistant to the President, and special assistant to the
 [16] President. I fell in between special and deputy.
 [17] Q Okay.
 [18] A It was a unique role.
 [19] Q But, I mean, within legislative affairs.
 [20] A Where was I?
 [21] Q Yeah.
 [22] A Number three, in all likelihood.
 [23] Q All right. Who was number two?
 [24] A Susan Brophy.
 [25] Q Who was number one?

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[1] a federal crime.
 [2] A Yes, sir.
 [3] Q All right. If there's any question you don't
 [4] understand, please ask us to repeat it because, you know,
 [5] it's vague, we haven't quite asked it in the right way,
 [6] it's incoherent.
 [7] A Yes, sir.
 [8] Q Ask us to repeat it, and we'll try to make it more
 [9] clear, okay?
 [10] A Okay, sir.
 [11] Q All right. Before we go on, are there any questions
 [12] you have about your rights and responsibilities as a
 [13] Grand Jury witness or about our authority?
 [14] A No, sir.
 [15] Q Okay. How old are you?
 [16] A Thirty-six years old.
 [17] Q And where are you from originally?
 [18] A Originally, Scranton, Pennsylvania.
 [19] Q All right. Tell us about your education.
 [20] A College, you mean?
 [21] Q Right. Where did you graduate?
 [22] A Oh, I graduated from the University of Scranton
 [23] in 1985.
 [24] Q All right. And what is your current occupation?
 [25] A I'm a lobbyist.

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[1] A There were several people -- during this
 [2] time period?
 [3] Q Well, when you left.
 [4] A When I left, it was John Hilley.
 [5] Q Okay. And what were the years that you worked as
 [6] staff director for?
 [7] A I was special assistant to the President when I
 [8] first went in in 1993. I moved up to staff director in 1994,
 [9] and was staff director in '94, '95, '96. And I left in April
 [10] of '97.
 [11] Q Okay. Plus, you were staff director when you left,
 [12] too, right?
 [13] A Yes, sir.
 [14] Q Okay. April '97. So you're there from '93 to
 [15] '97. When did you say in '93?
 [16] A The first day, January --
 [17] Q Is it January 20th?
 [18] A -- 20th.
 [19] Q Of 1993, until April of '97, correct?
 [20] A Yes, sir. It was April 15th.
 [21] Q Okay. And you became staff director in
 [22] '94, correct?
 [23] A I'm sorry, I said April. It's March. I'm trying
 [24] to figure out when Saint Patrick's Day was.
 [25] Q March.

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[1] Q And for what company?
 [2] A A partner at Timmons and Company. It's a
 [3] D.C.-based lobbying firm.
 [4] Q All right. And any particular area that you lobby
 [5] in, or just general lobbying?
 [6] A No, sir, general lobbying.
 [7] Q How did you get that job?
 [8] A I just -- I just got it just several months ago.
 [9] The board offered me a partnership, and I just accepted it.
 [10] Q How long have you been there? Is it a few months?
 [11] A It's weeks -- probably six weeks.
 [12] Q All right. Before you did that, what did you do?
 [13] A I was vice president for federal affairs for the
 [14] American Council of Life Insurance for 10 months. It's a
 [15] trade association here in Washington that represents 540
 [16] insurance companies.
 [17] Q 1001 Pennsylvania Avenue?
 [18] A Yes, sir.
 [19] Q Okay. And how long were you doing that?
 [20] A Ten months.
 [21] Q And what did you say -- vice president for what?
 [22] A Federal affairs. I was a lobbyist. I was the
 [23] chief Democratic lobbyist.
 [24] Q All right. You weren't in the communications
 [25] area there?

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[1] A March.
 [2] Q March 15th.
 [3] A Yes, sir.
 [4] Q Okay. It's almost as famous as April 15th.
 [5] A That's it.
 [6] Q Well, how did you get your job in office of
 [7] legislative affairs?
 [8] A When I -- I was working on the Hill, and I was
 [9] contacted by Howard Paster. This was after the election in
 [10] November. Howard was doing the confirmation team for the
 [11] President's cabinet. He was getting them confirmed. And he
 [12] asked if I would come down and help him.
 [13] Q All right. And you just stayed on?
 [14] A Yeah, I did. And sometime -- you know, sometime
 [15] before January -- you know, probably sometime in December --
 [16] Howard had asked me to come on as special assistant to the
 [17] President and try and help him run -- manage things in
 [18] legislative affairs.
 [19] Q In September of when?
 [20] A No, no, I'm sorry -- December.
 [21] Q December.
 [22] A December of '92.
 [23] Q Of '92?
 [24] A Yes, sir.
 [25] Q Okay. He was the original head of legislative

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[1] affairs -- Howard Paster?
 [2] A Yes, sir.
 [3] Q That's P-a-s-t-e-r?
 [4] A P-a-s-t-e-r.
 [5] Q All right. And he was replaced by who?
 [6] A He was replaced by Pat Griffin.
 [7] Q All right. And then Griffin was replaced by
 [8] Hilley?
 [9] A John Hilley.
 [10] Q Okay. Well, we'll get into exactly the times that
 [11] the number one people there were in a minute.
 [12] A Yes, sir.
 [13] Q Tell us what you did. What were your duties when
 [14] you went to work there?
 [15] A Various duties. I was -- even though I didn't have
 [16] the title of staff director yet, I generally was. I -- you
 [17] know, any personnel decisions, moving people around -- there
 [18] was an administrative function to that office -- I handled
 [19] that, as well as lobbied both House and Senate on any issue
 [20] that came before the Congress.
 [21] I didn't usually track it through committee. I
 [22] just -- I did the floor piece of it because of personal
 [23] relationships with members of the House and Senate.
 [24] Q All right. Which leads into my next question
 [25] of: What did the office do?

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[1] A What's the function of office of legislative
 [2] affairs?
 [3] Q Right.
 [4] A You're the liaison between the Hill and the
 [5] President -- and vice versa, between the President and
 [6] the Hill.
 [7] You -- you know, if there's a problem that --
 [8] you're trying to push the administration's priorities --
 [9] legislative priorities -- forward.
 [10] You're also -- you know, you also have to represent
 [11] to Congress -- the members of the House and Senate -- to the
 [12] President -- this is what they're saying.
 [13] Q Okay.
 [14] A So it's a -- it's a reverse role. It's both sides.
 [15] Q You mentioned that you would be involved before a
 [16] bill got to committee stage?
 [17] A No, I'd usually -- I did it when it hit the floor.
 [18] Q When it hit the floor?
 [19] A Yes, sir.
 [20] Q Okay. What does that mean, when it hits the floor?
 [21] A When -- when it comes -- when it comes, actually,
 [22] before the body.
 [23] Q Out of committee?
 [24] A Yes, sir. When it comes out of committee and goes
 [25] to the floor of the House or to the floor of the Senate.

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[1] Q Because that's where your contacts were -- more of
 [2] your contacts?
 [3] A It's members, yeah.
 [4] Q Now, it's not only people who work in office of
 [5] legislative affairs who are able to move things on the Hill;
 [6] is that correct?
 [7] A All items that are moved on the Hill should be
 [8] moved through the office of legislative affairs.
 [9] Q But as example, let's say you have a guy like a
 [10] George Stephanopoulos -- really high up, who also came from
 [11] the Hill. If you've got a particular piece of legislation
 [12] that needs to get through, he's not in office of legislative
 [13] affairs, but it was quite possible that he could have called
 [14] some people, that kind of stuff?
 [15] A That's true, yeah. But it's usually done in
 [16] coordination with.
 [17] Q Okay.
 [18] A I mean, it's not a perfect system. People -- we
 [19] always called them junior legislative affairs staff. Anybody
 [20] that once worked on the Hill feels they have the right to
 [21] call the Hill.
 [22] Q Okay.
 [23] A It's, you know -- yeah, that's always been a
 [24] problem with every administration, not only this.
 [25] Q What were the components of the office -- the

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[1] official components, if there were any? Was it broken down
 [2] into sections, divisions?
 [3] A There was, yes. There was a West Wing office,
 [4] where I was. There's where the director was, the deputy
 [5] direct, myself, and two staff assistants.
 [6] Then there was the East Wing, and that was broken
 [7] into three pieces. There was a House liaison office; there
 [8] was a Senate liaison office; and then there was an office
 [9] of correspondence.
 [10] So the office was really separated, you know. I
 [11] was in the West Wing, everybody else was in the East Wing.
 [12] And then, in the East Wing, the House was on one side of
 [13] the aisle, the Senate was on the other side. And then
 [14] down the hallway, in a separate corridor, was the office
 [15] of correspondence.
 [16] Q Would it be fair to say that the West Wing office
 [17] was more prestigious?
 [18] A Surely. Yes.
 [19] Q And what did House and Senate liaison do?
 [20] A It's the same. There are lobbyists for the House
 [21] and lobbyists for the Senate. They track legislation to and
 [22] -- you know, through the committee process.
 [23] They're supposed to be on the Hill every day,
 [24] moving around, trying to find out what's going on, trying to
 [25] help members. They're the contacts. That's the President's

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[1] face on the Hill.
 [2] So one group does it for the House, one group does
 [3] it for the Senate.
 [4] Q All of these people, aside from the director and
 [5] the deputy director, worked for you. They were under you in
 [6] the chain of command.
 [7] A Yeah. There were two deputies, though. There was
 [8] a House deputy and there was a Senate deputy.
 [9] Q Okay.
 [10] Q And, you know, it -- you know, the lines there are
 [11] more fuzzy. You know, if I called them up and asked them to
 [12] do something, I would do it -- they would do it for me.
 [13] You know, technically, on the chart in the
 [14] White House they were above me but, you know, that never
 [15] really mattered much.
 [16] Q Okay. And is that based on some know-how
 [17] that you had?
 [18] A Yes, sir.
 [19] Q You'd call them up, based on your knowledge, and
 [20] say, "You need to do this. You need to do that." It's not
 [21] like you're giving them orders. It's like, "This is what
 [22] needs to be done to get the legislation passed."
 [23] A We were colleagues. And, you know, when you work
 [24] 18 hours a day, you generally become friends with people,
 [25] and there's no -- there's no power trip, you know. You know,

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[1] everybody works to -- for one -- for one goal, and whatever
 [2] that goal is for that day, to try and get it done.
 [3] Q Would it be fair to say that you usually had more
 [4] hands-on experience with the Hill than the deputy directors?
 [5] A No, they -- they were to be on the Hill every day.
 [6] Not Brophy -- not Susan Brophy. She was the inside. But,
 [7] yeah, there was -- there was a House liaison. And the way
 [8] the office -- maybe I should explain the way the office is
 [9] set up. It may be easier.
 [10] Q In the House, there is a deputy director for the
 [11] House liaison, and then there were several special assistants
 [12] to the President.
 [13] They're the -- that is the -- and the same on the
 [14] Senate side -- a deputy assistant to the President and
 [15] several special assistants to the President.
 [16] They are the day-to-day lobbyists on the Hill.
 [17] They're the ones that have line item responsibilities for
 [18] this committee or this legislation. I wouldn't get to that
 [19] point until it actually came to the floor.
 [20] Q Okay. Got you. Do you know Monica Lewinsky?
 [21] A Yes, sir, I do.
 [22] Q How did you meet her?
 [23] A I hired her.
 [24] Q How did she get brought to your attention?
 [25] A She was working in correspondence for -- as an

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[1] intern for Leon Panetta's office. And Jennifer Palmieri
 [2] brought her to my attention.
 [3] It was Jen -- there were several people that called
 [4] on her behalf that -- they knew I had an opening in --
 [5] Q For what?
 [6] A The correspondence office, as a staff assistant. I
 [7] had a young woman leave, and an opening became available.
 [8] And you have -- the way the White House works is when that
 [9] person leaves, you have to process paperwork, and it goes
 [10] through the administrative office.
 [11] So the administrative office knew I had an
 [12] opening. Tracy -- I can't think of her last name right now
 [13] -- who did Leon Panetta's correspondence --
 [14] Q Beckwith?
 [15] A Beckwith. Okay. -- worked -- used to work
 [16] in the administrative office so, you know, she knew I had
 [17] an opening.
 [18] Q I don't know -- is it Beckwith?
 [19] MS. WIRTH: Bobowic?
 [20] BY MR. WISENBERG:
 [21] Q Bobowic? Beckwith?
 [22] A You know, I can't remember.
 [23] Q Okay.
 [24] A She got married. That's part of the problem. And
 [25] I just --

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[1] Q That's not an editorial statement about marriage?
 [2] A No, it's not. I just -- she changed her name,
 [3] and I -- you know, at that point, I just called her Tracy.
 [4] I apologize.
 [5] Q Okay.
 [6] A And they -- you know, they contacted me and
 [7] said that they had an intern that was doing a great job;
 [8] was I interested.
 [9] Q Let me just ask you -- I want to just make
 [10] sure about something: This Tracy actually worked for
 [11] under Panetta?
 [12] A Yes.
 [13] Q Okay.
 [14] A She was the staff person for Leon, and Monica was
 [15] her intern.
 [16] Q Okay. So you've mentioned Tracy, and you've
 [17] mentioned Jennifer Palmieri.
 [18] A Jennifer Palmieri.
 [19] Q How about Ashley Raines?
 [20] A Ashley Raines, yeah.
 [21] Q Okay. What did Ashley Raines -- what was
 [22] her input?
 [23] A She was -- she -- as I remember, I think she was
 [24] her friend. And, you know, I mean, I was more interested
 [25] in hearing what Tracy had to say about her than I was

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[1] anybody else.
 [2] Q Because Monica had worked as an intern there.
 [3] A Right.
 [4] Q All right. And what did Tracy tell you?
 [5] A All of the reviews were good -- a good kid, always
 [6] at work, smart, deserves a shot.
 [7] Q All right. Nobody told you anything bad about her?
 [8] A No. And that's -- I mean, that's how I generally
 [9] got a lot of my staff.
 [10] Q Okay.
 [11] A I was big on promoting from within and also giving
 [12] the kids that worked there for free a shot at a job.
 [13] Q As a general matter, how typical was it for people
 [14] to be -- I don't mean just in your office, but as a general
 [15] matter, how typical was it for somebody to go from an
 [16] internship directly into a White House staff job?
 [17] A Very typical. I mean, I -- I've had a lot.
 [18] Q Okay. Well, I'm not asking just about yours.
 [19] We'll get to your office in a minute.
 [20] A Yeah.
 [21] Q But apparently, it is typical in your office?
 [22] A Yeah. I think it's typical within the White
 [23] House. You have several types of interns. You have interns
 [24] that have finished college and are looking for a job. You
 [25] have interns that are, you know, just there for a summer or

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[1] there for a semester and going back to school.
 [2] And, you know, those that are looking for a job, if
 [3] they -- if they shine, you tend to try and help them.
 [4] Q Okay. Now, are you in a position to tell us how
 [5] common it is for someone to go directly from an internship
 [6] into an agency job?
 [7] A I don't do that. I'm sorry.
 [8] Q Okay. But it's not like automatically you can go
 [9] from an internship into a staff job, correct?
 [10] A Oh, no, no.
 [11] Q There has to be some indication of superior
 [12] performance?
 [13] A Yes. And you have to have, you know, the
 [14] person that supervised you on a daily basis actually take an
 [15] interest -- somebody that -- you know, this is worth keeping.
 [16] Q Okay. You've mention Tracy in Panetta's office.
 [17] You've mentioned --
 [18] A Jen.
 [19] Q -- Jennifer Palmieri --
 [20] A Yes, sir.
 [21] Q -- and Ashley Raines. Anyone else you
 [22] can remember?
 [23] A I think that's pretty much it in Leon's office.
 [24] Q Okay. Other than that, what kind of reference
 [25] checks did you do?

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[1] A That was it. I mean, I talked to her. I had
 [2] interview with her.
 [3] Q Okay. How did that go?
 [4] A I asked for some writing samples. You know, just
 [5] the standard interview. It went very well.
 [6] Q The interview went well. You were pleased with her
 [7] writing samples.
 [8] A Mm-hmm.
 [9] Q You've got to say "Yes" or "No."
 [10] A Oh, yes, sir. I'm sorry.
 [11] Q Because on the paper, we don't know whether it's
 [12] "Uh-huh" or "Un-un."
 [13] A I apologize.
 [14] Q That's fine. That's all right. Did anybody, when
 [15] you were making this decision about hiring Ms. Lewinsky for
 [16] correspondence, warn you about any potential problems
 [17] with her?
 [18] A No, sir.
 [19] Q Anybody tell you that she might be a -- do you know
 [20] what the phrase "clutch" means?
 [21] A I do. I've used it.
 [22] Q Okay. And what does it mean?
 [23] A A clutch is somebody that is -- is always trying to
 [24] get into a photo, trying to be on with the principal, trying
 [25] to -- you know, gets ahold of someone and won't let go.

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[1] Q Okay. Did anybody warn you that she was a clutch?
 [2] A No.
 [3] Q Did anybody say to you, "She's been spending too
 [4] much time with the President"?
 [5] A No.
 [6] Q Anybody say to you that there's speculation she
 [7] might be having an affair with the President?
 [8] A No.
 [9] Q Did anybody say to you that Evelyn Lieberman
 [10] doesn't like her?
 [11] A No.
 [12] Q If Evelyn Lieberman hadn't liked her, what would
 [13] that have meant to you?
 [14] A She was deputy chief of staff of the White House.
 [15] If, you know, Evelyn had said to me, "Don't hire her," I
 [16] probably wouldn't have hired her.
 [17] Q Okay. Do you recall any problems in her
 [18] background, in terms of when you went and looked at her
 [19] background information?
 [20] A I don't look at her background information.
 [21] Q Why not?
 [22] A It's not my job. I mean, I get her resume, I
 [23] look at her resume, and it was a -- you know, it was fine.
 [24] As far as her background is concerned, that's -- you know,
 [25] the White House counsel does that.

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[1] Q Okay.
 [2] A And, you know, as long as she clears them and
 [3] clears a drug test --
 [4] Q Nobody had told you about any problems with her
 [5] background check?
 [6] A No, sir.
 [7] Q All right. And that was presumably done when she
 [8] got the intern position, correct?
 [9] A Presumably.
 [10] Q Some kind of a background --
 [11] A Some type of a check generally would be done.
 [12] Q They don't just let anybody in to be an
 [13] intern, right?
 [14] A I'm -- I'm not certain how they did it. I think --
 [15] I think they've actually typed it up in recent years, but I'm
 [16] not certain how -- at the time what the process was.
 [17] Q All right. You don't whether or not she had to go
 [18] through a rechecking of the background when she went to work
 [19] for you?
 [20] A She did, but it was -- it was -- I believe it was a
 [21] more --
 [22] Q Thorough?
 [23] A -- intense, more thorough.
 [24] Q Okay. And somebody would have come to you from the
 [25] counsel's office, if there had been a problem?

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[1] A Yes, because that had happened in the past.
 [2] Q All right. That's not your job, to look at the
 [3] background.
 [4] A No, sir.
 [5] Q It's somebody else's job to look, and if there's a
 [6] problem, tell you, "We've got a problem."
 [7] A If there's a problem that would prevent her from
 [8] being employed, they would come to me and say, "She's got to
 [9] go," or "He's got to go."
 [10] Q Okay.
 [11] A If there was a problem in the background that could
 [12] be explained or worked out, I probably never would have known
 [13] that. They would have gone directly to that person.
 [14] Q Did the President say anything about her, directly
 [15] or indirectly?
 [16] A Never.
 [17] Q Did he have any input into her hiring by you, as
 [18] far as you know?
 [19] A No, sir.
 [20] Q Direct or indirect?
 [21] A No, sir.
 [22] Q You've mentioned that you heard she did good work
 [23] as an intern, is that correct?
 [24] A Yes, sir.
 [25] Q Did you hear anything in particular about her work

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[1] -- well, our indication is that she went to work for you
 [2] sometime in November of 1995.
 [3] A That's where I get confused myself, because I
 [4] believe that I made an offer for her to come to work in
 [5] November, but that's when the government shutdown occurred.
 [6] Q Okay.
 [7] A So I'm not quite -- I don't -- I don't quite
 [8] remember whether her paperwork was processed before the
 [9] government shutdown. She may not have actually been an
 [10] employee of mine until after December, when the government
 [11] was reinstated -- came back.
 [12] Q All right. When you made the decision to hire her,
 [13] do you think that was before the shutdown?
 [14] A Yes.
 [15] Q Okay.
 [16] A Yes, I know it was because -- when -- you only had
 [17] to have to essential personnel on. Interns could come in,
 [18] and it was essential personnel only. And I -- she wouldn't
 [19] have been essential personnel for me, but if she was an
 [20] intern, she could have still worked.
 [21] Q What if she was neither? Could she have gotten in
 [22] on some kind of special pass? If she wasn't an intern yet
 [23] and hadn't gone to work for you?
 [24] A If she wasn't an intern -- she could have been a
 [25] volunteer, sure.

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[1] Q Okay.
 [2] A But I -- I'm not certain --
 [3] Q Sure.
 [4] A -- of that process. I think you have to have
 [5] paperwork done on that.
 [6] Q So basically, you did not hire her based on hearing
 [7] about any standout performance that she did during the
 [8] shutdown.
 [9] A No, but -- no. She did a -- she did a -- she did a
 [10] real good job. And that's -- I keep on -- you know, this is
 [11] such a short time period. I keep on getting it confused.
 [12] But I think I offered her the job first, and I was
 [13] -- I was actually pleased I did in December. She did a good
 [14] job during the shutdown.
 [15] Q All right. You heard at some point -- whether or
 [16] not it was a basis for hiring her, and apparently it wasn't
 [17] -- you did hear that she did a really good job --
 [18] A Yes, sir.
 [19] Q -- during the shutdown.
 [20] A During the -- I observed she did a good job.
 [21] Q Okay. You observed that.
 [22] A Yes, sir.
 [23] Q And in what sense did she do a good job?
 [24] A She was down in -- in Mr. Panetta's office, helping
 [25] answer the phones, doing some general typing -- office work.

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[1] You know, it was a unusual time, not too many people around,
 [2] so I do remember it well.
 [3] Q You saw her there a lot keeping long hours?
 [4] A She -- yes. Yes.
 [5] Q All right. Did you see her in the presence of the
 [6] President at any time during the shutdown?
 [7] A Yeah, the President came into Leon's office.
 [8] Q And so did you ever see her and the President alone
 [9] during the shutdown?
 [10] A Never alone. I tend to believe that's the first
 [11] time he ever met her, too, was during that -- it was during
 [12] that government shutdown.
 [13] Q All right. Just a guess on your part or --
 [14] A I believe I was in the room when -- when, you know,
 [15] he introduced himself.
 [16] Q To Ms. Lewinsky?
 [17] A Yeah, and to -- there was another -- I think
 [18] there was another -- there may have been another kid in the
 [19] room, too.
 [20] Q Was there anything about the President's
 [21] interaction with Ms. Lewinsky during the shutdown that struck
 [22] you as -- that made you think?
 [23] A No, sir.
 [24] Q All right. You know, sometimes something will
 [25] happen, it doesn't seem important at the time, and then two

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[1] years later, a big event happens and you think, "Hmm." You
 [2] think back, and all of a sudden, the earlier event takes on
 [3] more importance.
 [4] Are there any events like that with respect
 [5] to Ms. Lewinsky?
 [6] A No, sir.
 [7] Q In your mind.
 [8] A In my mind, no, sir.
 [9] Q Okay. Did he seem to be chatting more with Ms.
 [10] Lewinsky than with any others during the shutdown?
 [11] A No, sir.
 [12] Q Okay. Do you know anything about whether or not
 [13] Ms. Lewinsky delivered pizza to the President during
 [14] the shutdown?
 [15] A We got pizza -- we got pizza from -- it was
 [16] Bertucci's even. I remember that. She may have taken pizza
 [17] down to Betty and Nancy and the President. I'm not certain.
 [18] Q You don't know for sure?
 [19] A I'm not certain, no. I'm sorry.
 [20] Q Do you think you might have heard that, or just
 [21] that it's likely it might have happened?
 [22] A I think that -- they weren't coming up, so I think
 [23] she -- I think somebody did bring it down, and it probably
 [24] would have been Monica.
 [25] Q You don't have a particular recollection of

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[1] that, though?
 [2] A No, sir. I do remember getting pizza, though. You
 [3] can tell from the size of me.
 [4] Q You said you witnessed that she did good work in
 [5] the shutdown. Did you hear anything bad about anything she
 [6] did during the shutdown?
 [7] A No, sir.
 [8] Q All right. Nobody told you that her behavior was
 [9] inappropriate?
 [10] A No, sir.
 [11] Q And you didn't see my inappropriate behavior by her
 [12] during the shutdown?
 [13] A No, sir.
 [14] Q You didn't hear any scuttlebutt or rumor about her
 [15] being a clutch during the shutdown.
 [16] A No.
 [17] Q Didn't hear anything about her having a
 [18] relationship with the President during the shutdown?
 [19] A No, sir.
 [20] Q Okay. What, if any, effect did Walter Kaye have on
 [21] getting her the job in your shop?
 [22] A None.
 [23] Q All right. Tell us how she performed when she went
 [24] to work for you.
 [25] A Unfortunately, she performed like an intern, rather

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[1] than a staff person.
 [2] Q And what do you mean by that?
 [3] A Interns are generally not as responsible. She --
 [4] she didn't -- she didn't live up to my expectations as a
 [5] staff person.
 [6] Q Okay. Why not?
 [7] A She was out of the office a lot. She was flighty.
 [8] The work wasn't getting done.
 [9] Q Okay.
 [10] A She didn't last long.
 [11] Q All right. You told me three things: She was out
 [12] of the office a lot; she was flighty; and the job wasn't
 [13] getting done.
 [14] A I think it's -- but I think the -- two reasons
 [15] affect the one. The job isn't getting done because of out of
 [16] the office a lot and flighty.
 [17] Q Fine. What do you mean by "flighty"?
 [18] A Oh, just -- just more interested in getting
 [19] into photo ops than doing her job. More interested in
 [20] getting into an event than doing her job. You know, more
 [21] interested in walking around to see who she could see than
 [22] doing her job. You know, she -- she didn't take it seriously.
 [23] Q What particular job was she hired for?
 [24] A For correspondence. Staff assistant in
 [25] correspondence.

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[1] Q Okay. And what was she supposed to do?
 [2] A What they do is -- several things. One is,
 [3] they write letters. The letters that they generally write
 [4] are the, you know, "Happy Birthday, Congressman X" type
 [5] of letters.
 [6] They also are responsible for getting all of the
 [7] mail from the Hill. Every House member, every Senator -- all
 [8] the mail that comes in from them goes to this office.
 [9] If it's -- if it's something that can be just a --
 [10] you know, "Thank you for writing. We'll keep this --" you
 [11] know, "We'll keep this on track," blah, blah, blah, and send
 [12] it out, they did it.
 [13] If it was a letter of substance -- if the letter
 [14] actually required a substantive response, their job would
 [15] be to task it to OMB, to Treasury, to, you know, Labor,
 [16] wherever.
 [17] Q Okay.
 [18] A And then when they'd get the response back, you
 [19] know, a decision would be made somewhere along the line
 [20] whether that letter should be answered by the President, or
 [21] whether the letter should be answered by a secretary, or
 [22] whether the answer should be by somebody in the White House
 [23] other than the President. And their job would be to make
 [24] sure that that got done.
 [25] And if the letter was from the President, they

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[1] would get it back from the agency, format it, check it for --
 [2] check it for, you know, grammatical errors. And then they
 [3] would put it on -- the President has a special paper. It's
 [4] called azure, and they would put it on the azure and then
 [5] submit it for signature.
 [6] Q Who did she work directly for?
 [7] A She worked directly for me. There was other people
 [8] in the office. Jocelyn Jolley was -- was in the office, as
 [9] well. She had worked for me as a staff assistant on the
 [10] House side.
 [11] Q Who?
 [12] A Jocelyn Jolley.
 [13] Q Okay. Jocelyn Jolley wasn't her immediate
 [14] supervisor?
 [15] A She was -- to say -- technically, yes. But there
 [16] was -- yes. I'll -- I'll live with that.
 [17] Q How many people were in that section -- the
 [18] correspondence section?
 [19] A There's always -- there's two staff people.
 [20] Q All right.
 [21] A And then, you know, interns.
 [22] Q All right. So she and Ms. Jolley were the two?
 [23] A Yes.
 [24] Q All right. Now, why do you say Ms. Jolley was
 [25] technically her superior?

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[1] A Well, as I said, this was kind of loose, in the
 [2] sense of operation. Everybody worked to get everything
 [3] done. I was a supervisor, in the sense of -- you know, if
 [4] Monica wanted a day off, she wouldn't go to Jocelyn, she
 [5] would go to me.
 [6] Q Okay.
 [7] A You know, so -- you know, Jocelyn, on paper,
 [8] could technically claim that she was the director of
 [9] correspondence, but it's more of a loose organization
 [10] than that.
 [11] Q Who was Monica's predecessor?
 [12] A Right before Monica, Melissa Bates was -- or was it
 [13] Chris Walker? Melissa -- no, it was Chris Walker, and right
 [14] -- but he wasn't there very long. It was Monica -- or --
 [15] Q Melissa Bates?
 [16] A Melissa Banks.
 [17] Q Banks?
 [18] A Melissa Banks.
 [19] Q Okay.
 [20] A And before Jocelyn, it was LeAnn Inadomi. Jocelyn
 [21] had not been in that job all that long, either.
 [22] Q Okay. Did Jocelyn have any effect on the decision
 [23] to hire Monica Lewinsky?
 [24] A I let her -- I let her interview her, but --
 [25] Q Okay.

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[1] A -- you know, no, she -- I let her interview her,
 [2] and got her opinion, but she wasn't going to be the -- she
 [3] wasn't doing the hiring or the firing.
 [4] Q Okay. Do you recall Jocelyn getting mad at all
 [5] because Monica was hired kind of without her say-so at all?
 [6] A We had a conversation about it.
 [7] Q Okay.
 [8] A And, you know, I told Jocelyn it wasn't her job.
 [9] [REDACTED]
 [10] [REDACTED]
 [11] I was still -- I was having problems with Jocelyn,
 [12] always carrying her. And quite frankly, I wasn't going to
 [13] get put into a situation where she was going to be the
 [14] deciding factor as to whether I should hire someone or not.
 [15] Q Do you recall getting a memo or an e-mail from
 [16] Jocelyn Jolley complaining about, in general, not being told
 [17] about Monica being hired, and you telling her that her memo
 [18] was out of line?
 [19] A I probably did.
 [20] Q Okay.
 [21] A I -- I -- I don't remember it, but I
 [22] probably did.
 [23] Q Okay.
 [24] A I know I had a conversation. I'm not certain if I
 [25] remember an e-mail, but I know I had a conversation with her

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about it.
 Q But you think you would have ultimately let her interview Ms. Lewinsky?
 A I did let her interview. I'm -- I'm sure I let her interview her.
 Q Would this have been after --
 A Or talk to her, or whatever you want to call it.
 Q If you recall, would this have been before or after she complained that it was kind of a fait accompli -- Ms. Lewinsky being hired?
 A I don't quite remember.
 Q Okay. So you were already having problems with Jocelyn Jolley when you hired Monica Lewinsky?
 A Yeah, she was a great staff assistant, but she just didn't live up to the role of the detail that was needed for the correspondence job.
 Q You mean staff assistant on the Hill?
 A On the House -- no, sir, on the House side of the legislative liaison shop.
 Q Oh, correct. Because that's what she had done before she went over to correspondence.
 A Yes.
 Q All right. She had been in legislative affairs -- Jocelyn Jolley -- before she got the correspondence --
 A Yes, sir.

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Q -- supervisor job?
 A Yes, sir. She was a staff assistant in the House side. She, you know, answered the --
 Q But within legislative affairs.
 A Oh, yes, sir.
 Q And she was perfectly fine.
 A Yeah. I didn't pay that much attention to her at the time. I mean, she was Lorraine Miller's personal assistant, who was -- Lorraine at the time was the deputy assistant to the President and the liaison -- the top liaison for the House. And you know, as long as Lorraine didn't have any problems with her, I didn't.
 Q Did Ms. Lewinsky, like, from the git-go disappoint you, or was it more of a gradual process -- Ms. Lewinsky, I'm talking about?
 A Yes, sir. I -- she was there such a short period of time, so I don't know how -- you know, from the git-go versus -- versus, I mean --
 Q Well, apparently she was gone by about April 9th, right?
 A April, right. Yeah, it was Easter.
 Q And she would have started in December, so we're talking about five months.
 A So it was a short period of time. She was just not -- not doing it.

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Q Okay.
 A So I'm not certain where whether it was from day one, or whether it was from day five. I just don't know that.
 Q There would be some instances where she would not be at arrest desk when you needed her.
 A Yes.
 Q Now, did you have absences problems with Ms. Lewinsky? Was she absent, in the sense that she'd be gone for several days, or anything like that?
 A Not -- not days absent. Absence in the sense of not being at her desk.
 Q Okay. Any particular lack of performances by her? Let's talk about particulars. You're saying her flightiness and her wanting to be gone all the time contributed to a lack of performance. Do you remember any particular things?
 A Well, the job wasn't getting done. That's how this whole thing came to a head. I got a huge supply from OMB of letters that had not been tasked that were months old.
 Q And, you know, all of a sudden, they just dumped a huge supply of -- a huge supply of letters on OMB, saying, "You know, 'We need a response ASAP on the following letters.'"
 Q And many of the dates on the letters -- the original dates on the letter -- were months old.
 Q Okay.

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A So that's a -- that's a big problem.
 Q And when did that happen?
 A That happened sometime before April.
 Q And OMB complained about it?
 A OMB complained about it.
 Q All right. And what did you do about that?
 A That's -- that's when -- that's when this whole -- the whole thing just came to a head. I -- the way I believe it happened, you know -- if I knew this was important, I would have paid closer attention at the time, but I believe what happened was Jodie Torkelson, who was the head of the office of administration, she's kind of the chief administrative officer of the White House. Before she had that job, she was at OMB.
 Q And I think what happened was OMB went to Jodie and said, you know, "What do we do with this?" And then Jodie went to Evelyn, and then, you know, that's how I got into it.
 Q You know, "This office is not working."
 Q All right. Are you saying that the incident with OMB more or less was the cause of Jocelyn Jolley and Monica Lewinsky being let go?
 A What I'm saying is that's -- that's the straw that broke the camel's back.
 Q Okay.
 A There -- you know, that's -- that's -- that's the

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event that --
 Q As far as you were concerned.
 A Yes, sir. That's the event that brought everything -- you know, how bad this shop really was, and that they really weren't getting the job done.
 Q Okay. And this was brought to your attention, or Jodie's first?
 A It was -- I believe it was brought to Jodie's first.
 Q Okay. And did Jodie then tell you about it?
 A I believe Jodie told Evelyn.
 Q Okay.
 A And that's why I got into it.
 Q All right. And then Evelyn came to you?
 A Yes.
 Q Okay. And what did Evelyn say to you?
 A She wanted an explanation.
 Q Of what?
 A Of, you know, why letters were being tasked, you know, six months late. You know, what's the problem? You know, there's a problem over in that office. You know, things aren't getting done. You know, there was mistakes in -- mistakes in letters that hadn't been caught.
 Q Evelyn knew about other things, too, when she came to you complain to you?

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A I believe -- I believe. I mean, it's -- it's hard. I mean, we looked at the shop really hard at that time and, you know, there was a real problem there. Jocelyn was -- was not showing up for work. When she did show up, she was -- she was, you know, in late, out early. And quite frankly, we carried her for a long time because she had some health problems.
 Q That's Jocelyn Jolley?
 A Yes, sir.
 Q [REDACTED]
 A [REDACTED]
 Q Who was that?
 A John Hilley.
 Q Okay.
 Q And, you know, all of a sudden, you know, his shop is -- is at the center of attention because, you know, they're not performing their -- their job.
 Q I mean, it's a big deal for a member of Congress to get a letter -- a response back from the President that's months old. He's -- he refuses to sign letters like that.
 Q He really -- that would bother him.
 Q All right. What do you remember -- tell

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[1] us everything you remember about the discussion when
 [2] Evelyn Lieberman finally came to you. What's she mad about?
 [3] A Well, there was -- there were several discussions.
 [4] you know, in that OMB wasn't the only problem. I mean, there
 [5] was a problem -- OMB just happened to be the -- the thing
 [6] that she could point to.
 [7] Q Okay.
 [8] A And, you know, the discussion was -- I mean, the
 [9] discussion really was, "Let's get rid of them both."
 [10] Q Okay.
 [11] A "The job isn't being done, you know. What's your
 [12] opinion?" "Get rid of them both."
 [13] Q Okay. Who said, "What's your opinion?"
 [14] A Well, I mean, that was -- I think it may have been
 [15] -- I mean, I'm putting words in her mouth. It may have been
 [16] Evelyn as to, you know -- you know, "What do we think here?"
 [17] Talk with the --
 [18] Q [REDACTED]
 [19] [REDACTED]
 [20] A [REDACTED]
 [21] Q [REDACTED]
 [22] A [REDACTED]
 [23] [REDACTED]
 [24] [REDACTED]
 [25] Q [REDACTED]

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[1] than one discussion with Evelyn Lieberman about this; is
 [2] that correct?
 [3] A Yes, sir.
 [4] Q And if I remember correctly, you testified that
 [5] there was a complaint by the Office of Management and Budget
 [6] about some correspondence, and that you believe that made
 [7] its way up through somehow to Jodie Torkelson and from
 [8] Jodie Torkelson to Evelyn Lieberman; is that correct?
 [9] A Yes, sir. That's right.
 [10] Q All right. And then Evelyn Lieberman came to visit
 [11] you; is that correct?
 [12] A I went to visit her, but --
 [13] Q Okay. How did that happen? What occasioned your
 [14] visit to Evelyn Lieberman?
 [15] A I was -- she told me to come see her or her staff
 [16] assistant. I can't remember how it happened. All I remember
 [17] is that we ended up having a conversation about it.
 [18] Q Okay. She or her staff assistants told you to come
 [19] see Evelyn Lieberman?
 [20] A Yes. Yes.
 [21] Q Okay. And she was deputy chief of staff by this
 [22] time; is that correct?
 [23] A Yes, she was.
 [24] Q Okay. Tell us about that conversation or about any
 [25] other conversations. I think you mentioned over a period of

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[1] [REDACTED]
 [2] A [REDACTED]
 [3] Q [REDACTED]
 [4] A [REDACTED]
 [5] Q [REDACTED]
 [6] A [REDACTED]
 [7] Q [REDACTED]
 [8] A [REDACTED]
 [9] Q [REDACTED]
 [10] A [REDACTED]
 [11] Q [REDACTED]
 [12] A [REDACTED]
 [13] Q [REDACTED]
 [14] A [REDACTED]
 [15] Q [REDACTED]
 [16] A [REDACTED]
 [17] Q [REDACTED]
 [18] A [REDACTED]
 [19] Q [REDACTED]
 [20] A [REDACTED]
 [21] Q [REDACTED]
 [22] A [REDACTED]
 [23] MR. WISENBERG: Thank you.
 [24] (The witness was excused at 12:45 p.m. and recalled
 [25] at 3:33 p.m.)

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[1] a couple of days.
 [2] A Right. And it's -- it kind of gets a little
 [3] confused in my mind as to -- you know, the first -- the first
 [4] meeting, it was decided that it wasn't only Monica that was a
 [5] problem -- that the correspondence unit was a problem.
 [6] Q Okay.
 [7] A And the decision had been made or agreed to that we
 [8] should just get rid of the problem.
 [9] Q Okay.
 [10] A But neither person deserved to be terminated.
 [11] Q Okay.
 [12] A That to work it out with Patsy and Bob --
 [13] Patsy Thomasson and Bob Nash -- and, you know, see if we can
 [14] put them someplace else, give them another try, give them
 [15] another shot.
 [16] Q Okay.
 [17] A Which I did. I talked to Patsy and Bob. Then I
 [18] had a -- probably another follow-up conversation with Patsy.
 [19] So a lot of my talking back and forth with Evelyn
 [20] was, you know, "Have you done anything yet?" "Are you doing
 [21] anything?" You know, "What's the status?" It was that type
 [22] of conversations.
 [23] Q Okay. Tell us as best as you can recall -- you go
 [24] to your meeting with Evelyn Lieberman.
 [25] A Yes, sir.

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[1] ***
 [2] MR. WISENBERG: Let the record reflect that the
 [3] witness, Mr. Keating, has reentered the Grand Jury room.
 [4] Madame Foreperson, do we have a quorum?
 [5] DEPUTY FOREPERSON: Yes, we do.
 [6] MR. WISENBERG: Are there any unauthorized persons
 [7] in the Grand Jury room?
 [8] DEPUTY FOREPERSON: No, there are not.
 [9] Mr. Keating, I need to remind you that you're
 [10] under oath.
 [11] THE WITNESS: Yes, ma'am.
 [12] BY MR. WISENBERG:
 [13] Q Okay. Are you the same Tim Keating who was --
 [14] Timothy Keating -- who was testifying here earlier today?
 [15] A Yes, sir.
 [16] Q I think we were talking about -- and I think we
 [17] told you earlier you could come back at 3 o'clock, and you've
 [18] graciously consented to do so. And told you that we'd get to
 [19] you by 3:30, and we're pretty close.
 [20] A Yes, sir. Thank you.
 [21] Q All right. Once again, we appreciate your
 [22] long wait.
 [23] Let me ask you -- we were right at the point we
 [24] were talking about your dissatisfaction with the performance
 [25] of Monica Lewinsky, and I think you said you had more

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[1] Q At this point in time, you haven't even heard about
 [2] the incident with Office of Management and Budget.
 [3] A No, sir, I had.
 [4] Q You had heard. Somehow word had gotten to you.
 [5] A Oh, yeah. That's -- that's --
 [6] Q Okay.
 [7] A Well -- oh, I'm getting confused. Yeah. I can't
 [8] remember the -- I think what happened was -- I knew about it
 [9] going into it. I knew that there was a problem.
 [10] I don't know how I knew. Whether it was, you know
 [11] -- whether it was a conversation on the phone -- I knew that
 [12] there was a problem, and I knew the problems was involving
 [13] correspondence.
 [14] Q Going into the meeting?
 [15] A Yes, sir.
 [16] Q When you say the conversation on the phone,
 [17] you mean the conversation with either Ms. Lieberman or
 [18] her aide --
 [19] A Yes, sir.
 [20] Q -- asking you to come see Ms. Lieberman?
 [21] A Correct.
 [22] Q Okay. And I guess the reason I asked it that way
 [23] -- assuming that you might have not known going into the
 [24] meeting -- is that you said that information about this
 [25] incident went from Jodie to Evelyn Lieberman.

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[1] A Correct.
 [2] Q And then you're talking to Evelyn Lieberman.
 [3] So I didn't know if you knew about it before you went into
 [4] the meeting.
 [5] A No -- well, I knew about it in the sense that
 [6] -- you know, I know that before I went into that room,
 [7] I knew there was a problem, and I knew it was in my
 [8] correspondence office.
 [9] Q Okay. Now, tell us as best you can remember the
 [10] conversation you had with Evelyn Lieberman when you were
 [11] called into visit with her.
 [12] A As I said before, if I'd known it was important,
 [13] I would have paid closer attention. It's hard for me to
 [14] remember what, you know, fully went on, with the exception --
 [15] Q As best you can remember.
 [16] A Yeah. I mean, with the exception of, you
 [17] know, "How bad is this situation?" You know, "The
 [18] President would have a fit if he saw, you know, this stuff."
 [19] Q Meaning what?
 [20] A The letters that were backlogged coming out of my
 [21] office that members of Congress were not getting responded to
 [22] in a timely fashion.
 [23] And, you know, there were other problems,
 [24] and, you know, we talked about my correspondence unit, what
 [25] the problems were within it.

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[1] [REDACTED]
 [2] [REDACTED]
 [3] Q All right. In what way?
 [4] A Her not doing her job, being around -- you know,
 [5] how could she be doing her job if she was, you know, floating
 [6] in the West Wing and trying to get into photo ops.
 [7] And, you know, Evelyn was -- she was like the
 [8] strict mother of the West Wing. She knew who came in, she
 [9] knew who went out.
 [10] She -- you know, she -- she was not afraid of
 [11] anyone. She would tell people this and that, you know. You
 [12] know, "Put on your jacket."
 [13] She was -- she was very good. She was a hands-on
 [14] person. Well, you know, if you hang around, not doing
 [15] anything, Evelyn was sure to pick it up. And she sure did.
 [16] Q All right. And you had these conversations with
 [17] Evelyn even before --
 [18] A I had conversations with Monica about that before
 [19] all this --
 [20] Q About hanging around the West Wing?
 [21] A About hanging around the West Wing, about the
 [22] path she used to take to go to, you know, the Old Executive
 [23] Office Building.
 [24] See, part of the problem is that her office was in
 [25] the East Wing, and the auto pen -- which is a signature

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[1] device used for the President's signature on letters that
 [2] he's not going to sign personally -- is over here in the old
 [3] building (indicating). It's in the Old Executive Office
 [4] Building. It's in a separate -- separate building.
 [5] But to get from here to there, you have to go
 [6] through the executive residence, you have to go into the
 [7] West Wing, and the fastest route is to cut across the west
 [8] lobby and down the stairs and over.
 [9] You know, Monica would always take this big swing
 [10] around and go past the Oval Office, go past Evelyn's office,
 [11] go past Leon's office, seeing what was going on.
 [12] Q Let me show you something.
 [13] A Yes, sir, happy to.
 [14] Q I have an exhibit here. I'm going to call
 [15] this TK-1.
 [16] A Yes, sir.
 [17] Q And this purports to be a floor plan of the
 [18] West Wing.
 [19] A Mm-hmm.
 [20] Q Of the Oval Office level of the West Wing.
 [21] A Yes, sir.
 [22] Q And you can see there is some -- in addition to the
 [23] floor plan there's some writing on there. Do you see that?
 [24] A Yes, sir.
 [25] Q Okay. To the best that you can -- now, she's over

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[1] -- Monica is over in the East Wing?
 [2] A She's way over here (indicating).
 [3] Q Okay. And is she on this level, or a level higher?
 [4] A No, it's this level.
 [5] Q Okay.
 [6] A But when you -- actually, when you come across he
 [7] -- in the executive mansion, you come in the first floor,
 [8] which is a diplomatic receiving room and the library, a few
 [9] other rooms. And then you come out of the court -- a covered
 [10] court, and then you cross over another doorway to go
 [11] outside. You actually have to go outside.
 [12] But it's covered. It's -- the Rose Garden
 [13] to the left, which is outside of the Oval Office. The
 [14] Rose Garden is here. Then there's a brick -- not a brick,
 [15] but a stone patio that's covered that you walk up, and you
 [16] walk along, and then you enter two doors, and right here is
 [17] the press room (indicating).
 [18] Q Okay.
 [19] A The lower press office. And you come up and then
 [20] you -- as you come up, there's a police officer stationed
 [21] right here (indicating).
 [22] Q All right. Is that where it says "Desk No. 1" on
 [23] this map?
 [24] A It's -- it's -- I can't quite tell because I don't
 [25] know what this is, but that's probably right, because it's

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[1] stuck in the -- in the corner.
 [2] Q Okay. What I'd like you to do --
 [3] A Yes, sir.
 [4] Q -- is to the extent that you can do it on this map,
 [5] because this is only a map of the West Wing --
 [6] A Right.
 [7] Q -- on the level of the Oval Office.
 [8] A Yes, sir.
 [9] Q Show us with this red pen, this Sharpie --
 [10] A Yes, sir.
 [11] Q -- where Monica Lewinsky's route was that you
 [12] were just describing when she would go to get the autopen
 [13] signed, to the extent that you were saying she went by
 [14] Evelyn's office --
 [15] A Right. You --
 [16] Q You know, show us how this route would be, to
 [17] your knowledge.
 [18] A Well, it's the wrong way to go.
 [19] Q Which is the way she went.
 [20] A Correct. Well, at first. I think she straightened
 [21] up at the end, hopefully.
 [22] But she would come in. You walk past the cabinet
 [23] room. There's -- well, you come up the -- there's a ramp, as
 [24] I said, that leads -- this is the entrance to the lower press
 [25] office (indicating). You come in a door here, you come up

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[1] the ramp. The police station -- guard station is there. You
 [2] walk into a doorway.
 [3] There's a -- there's a hallway, but it's a broad
 [4] hallway because the cabinet room is here. And then instead
 [5] of making -- instead of going to the left out, she would
 [6] walk around this way past where, you know, the entrance to
 [7] Nancy Herreich's and Betty Currie's office.
 [8] Q Okay.
 [9] A And cut around. Now, these are all closed doors.
 [10] Q Right.
 [11] A There's a police officer stationed out here.
 [12] you know.
 [13] Q You're at 11 o'clock of the Oval Office?
 [14] A Yes, sir.
 [15] Q Okay. And you'd come this way (indicating). And
 [16] as you come around, George's office is here, Evelyn's office
 [17] is over here. There's a receiving room here with other
 [18] staff people.
 [19] Q Okay.
 [20] A And then the out door -- Leon's -- Leon Panetta's
 [21] receiving --
 [22] Q Right.
 [23] A -- is here where, you know, Jennifer Palmieri and a
 [24] few others were.
 [25] And then she would walk this way, past the

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Vice President's office this way. And then there's a hallway down that comes literally right out of this office. It goes down --

Q All right. Hold on just a second.

A -- and then down the stairs.

Q Okay. You said there's a hallway that goes out of the reception area to the right of Leon Panetta's office?

A No, this whole hallway -- the hallway is straight.

Q Okay.

A Like, if you're standing at the stairway at the West Wing, you can go straight through the lobby.

Q Okay.

A Or if you're looking straight ahead, you can literally look right into Leon's outer office.

Q Okay. You have stopped the red line right at where she would go down the stairway.

A Yes, sir, that's the stairs.

Q Okay. So you're starting it at the right -- the upper right of the map, and you're ending it kind of mid left.

A Yes, sir.

Q And you would say that's the route she would take, right by the Oval Office, and that is an incorrect route, or not the quickest route.

A Well, the -- I mean, if you look, here's the --

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here's the direct route.

Q Okay. With this blue pen --

A Yes, sir.

Q -- show us what she should have done. Put a line or arrow where she should have gone, instead of where you've done with the red pen.

A It's -- it's this route (indicating).

Q Okay.

A Should I go from here?

Q No, just the -- just where she should have deviated from.

A Okay. (Witness complies.) Right -- right here.

Q Okay. All right. All rightie. So I'm just going to hold it up for the grand jurors. You can come over here -- no, never mind.

A I'll be happy to.

Q No, stay where you are.

A Are you sure?

Q Stay where you are.

A Okay, sir.

Q I don't want to hurt your back any more. We've got the route in red, and we've marked in blue pen where the deviation should have been (indicating).

Q Okay. This red route takes you right by the Oval Office, the offices of Stephanopoulos, the offices

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of Panetta (indicating).

Q Okay. She took the scenic route.

A Yes, sir.

Q All right. Now, as I understand it, Ms. Lieberman had complained to you previous to this incident -- this what we'll call the OMB incidents -- about Monica hanging around -- the West Wing, or the Oval Office too much?

A No, it was always the West Wing. And a lot of it was this route that was the problem.

Q And you had actually spoken to Ms. Lewinsky about this?

A Yes, sir, I had.

Q What would she say when you would tell her about it?

A That she was just trying to do her job. But her job did not entitle her to hang around the West Wing or take that route. Just go through, get your job done, and go back.

Q And did you make that clear to her?

A Yes.

Q All right. I mean, that's not much of a response. Is it -- she's trying to do her job? The whole point is she doesn't have to go that route to do her job.

A Right. She -- you know, that's -- that's true.

Q Did she ever agree, "Okay. I won't do that as much"?

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A Yes.

Q I mean, presumably, if she had told you, "No, I'm going to continue to go right by the Oval Office here --"

A She would have had a problem.

Q Yes. Okay. How many times did Evelyn Lieberman discuss this issue with you -- Monica hanging around the West Wing -- which I take it merges with the route issue?

A Yeah.

Q Okay. How many times did she discuss this with you prior to the incidents that led to the removal of Ms. Lewinsky?

A Probably a couple times.

Q Okay. How many times did you discuss this with Ms. Lewinsky?

A Probably a couple times.

Q All right. Did Ms. Lieberman complain that she had seen Ms. Lewinsky several times take this route, or in the wrong place?

A It was, you know, how can -- you know, "What's going on over there?" She says, "Don't you have enough for her to do?" You know -- you know, "What's -- what's the problem?"

Q And you know, it was -- that was Evelyn's way. She would question that with anyone. You know, I mean, if she saw somebody not doing their job -- especially, you know, a

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paid staff person -- she would brush them away.

Q I mean, it's the same thing with, you know, people, if they smoked, and they -- I mean, you're not allowed to smoke in the building. They would go down on the West Drive, and if Evelyn came out, she would shoo them away, "Get back to work."

Q By the way, I might have asked you this before the break, earlier today, but have you been -- have you or your attorney been debriefed about anything Evelyn Lieberman has said and if Evelyn told investigators or has told anybody with respect to this case?

A I've not talked to Evelyn Lieberman. I don't know if my attorney has talked to -- I mean, I think he's talked to other attorneys in this --

Q Do you know whether or not he's been debriefed about anything Evelyn Lieberman has said about this case?

A Not to my knowledge.

Q Okay. Was Monica Lewinsky fired or removed -- first of all, how would you characterize it: Firing? Removal?

A She was -- she wanted to stay in the White House. She couldn't stay in the White House. If you want to classify that as firing, that's fine. But she was put into another position. She wasn't thrown out. She deserved to -- you know, in my opinion, she deserved

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to have another chance.

Q That's why I was asking you to characterize it. Would it be fair to call it a removal?

A She was removed. Yes, sir.

Q Okay. And she would have wanted to stay.

A She did want to stay.

Q She did want to stay.

A Yes, sir.

Q Okay. Was she removed --

A But so did Jocelyn Jolley.

Q So did Jocelyn Jolley?

A Yes, sir.

Q All right. Was she removed because of the OMB incident, or because she was hanging around the West Wing too much, or is there a third reason?

A I can't -- you can't separate the reasons. The reason was the job wasn't being done in the correspondence office.

Q Why wasn't the job being done in the correspondence office? Because of she wasn't at her desk enough, she walked around the West Wing a lot, she wasn't getting the job done.

A And Jocelyn, you know, was not a good supervisor. She was out a lot. She let things slide.

Q I mean, there's -- I think there's a thousand reasons that are there, and that's -- you know, it's

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[1] all one.
 [2] Q Did you say that the straw that broke the camel's
 [3] back -- for you, at least -- with Ms. Lewinsky was the
 [4] OMB incident?
 [5] A No, sir.
 [6] Q The final straw?
 [7] A The final straw with the office of correspondence
 [8] was the -- yeah, the OMB letters.
 [9] Q Okay.
 [10] A When I got -- I got pulled down. I had to explain
 [11] it. I had a new boss, who's saying to me, you know, "I'm in
 [12] the job a month, and I have, you know, people claiming that
 [13] we're not doing our job here." You know, "Fix it."
 [14] Q Okay. As far as you're concerned, was that the
 [15] final straw that caused you to want to remove Ms. Lewinsky
 [16] and Ms. Jolley?
 [17] A Yes, sir.
 [18] Q Okay. Now, was that a decision you reached
 [19] independent of anything Evelyn Lieberman said to you?
 [20] A It was -- it was joint.
 [21] Q Okay. Let me ask you this: At some point in time,
 [22] did Evelyn Lieberman say -- let's talk about Monica first.
 [23] Did she say, "Get rid of her"?
 [24] A I don't know if it was ever singled out her. I
 [25] think it was get rid of "them."

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[1] Q All right. And at what point -- you said you
 [2] talked to her more than once during a period -- I think
 [3] more than once during a period of a couple of days --
 [4] A Yes, sir.
 [5] Q -- after this OMB incident occurred; is
 [6] that correct?
 [7] A Right. Right.
 [8] Q Okay. At some point in time, Evelyn Lieberman
 [9] ordered you -- I want to know how it happened. At some point
 [10] in time, she said, "Get rid of them"?
 [11] A Right. We were talking and, you know, the
 [12] problem in the office -- you know, after this -- the OMB
 [13] thing, I went over and checked that to see, you know, what
 [14] the volume of correspondence was, versus what the output
 [15] was. And, you know, it was very clear that nothing was
 [16] getting done over there.
 [17] And there was problems beforehand. I'd talked to
 [18] both [redacted] and Monica about this. There were -- you know,
 [19] I would call over there. And the one thing that I always was
 [20] a fanatic about was having my phones answered, because I had
 [21] 535 constituents on the Hill that were demanding.
 [22] And, you know, I would call over to my office to
 [23] get a copy of a letter, and it would roll over to voice
 [24] mail. So, you know -- I -- you know, I told them that that
 [25] had to stop.

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[1] I mean, there was a series of events that led
 [2] up to -- to the final days. So when we went in to talk to
 [3] Evelyn -- I believe Jodie was in the room as well. You know,
 [4] it was, "Tell me what's going on over there."
 [5] Q Okay.
 [6] A And I had to be honest. I mean, the shop wasn't
 [7] running right. [redacted] you know, I carried her really
 [8] a long time. And I like her. She's a -- she's a sweet
 [9] person. And she'd worked there for three years, and she
 [10] got into a job that she couldn't handle. It doesn't mean
 [11] she deserved to be fired.
 [12] Monica was -- you know, she never made the
 [13] transition between a staff person -- an intern and a staff
 [14] person, you know. That's fine, too, but that's not something
 [15] that should prevent her from losing her job.
 [16] Q At some point in time, did Evelyn Lieberman say,
 [17] "Get rid of these people"?
 [18] A Yes.
 [19] Q Was Jodie Torkelson in the room when that happened?
 [20] A I'm sure -- I'm sure she was.
 [21] Q Okay. Did Evelyn Lieberman say -- I want you to
 [22] listen to my question very carefully, and if there's anything
 [23] about it you don't understand, I want you to ask me and I'll
 [24] rephrase it.
 [25] A Yes, sir.

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[1] Q Was this a situation where Evelyn Lieberman said,
 [2] "I want you to get rid of Monica Lewinsky because I'm tired
 [3] of her hanging around the West Wing," and then, "By the way,
 [4] what kind of worker is she?"
 [5] And you said something like, "Her work is really
 [6] bad, too." And Evelyn said, "Get rid of her."
 [7] Was that how the conversation went?
 [8] A No.
 [9] Q Okay. As I understand what you're saying,
 [10] it's a situation that Evelyn Lieberman knew about already,
 [11] in general.
 [12] A Right.
 [13] Q She knew that it was a situation of both inferior
 [14] work by Monica and [redacted] --
 [15] A Correct.
 [16] Q -- and the separate problem of Monica being where
 [17] she shouldn't be -- in the West Wing?
 [18] A That clearly added to it too, yes, sir.
 [19] Q And a precipitating factor -- in terms of
 [20] Evelyn Lieberman saying, "Get rid of them" -- was the
 [21] OMB incident?
 [22] A Yes, sir.
 [23] Q Is there any way about how I've described it that
 [24] is incomplete or that you would like to add to?
 [25] A No, I think that's pretty accurate.

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[1] Q Okay. Do you know whether or not Jocelyn Jolley
 [2] got any training for this particular job in correspondence?
 [3] A That's -- unfortunately, those jobs a lot of the
 [4] time of baptism with fire. The person that left was a woman
 [5] by the name of LeAnn Inadomi, who was absolutely wonderful.
 [6] She had done the job since day one.
 [7] She was still in the compound, working for cabinet
 [8] affairs. You know, as far as a, "Sit down, and let me walk
 [9] you through everything," no. There wasn't somebody sitting
 [10] with her for three weeks, training her.
 [11] Q Jocelyn Jolley?
 [12] A Correct. Training her exactly what to do. But,
 [13] you know, LeAnn told her how to do the job and what to do.
 [14] And LeAnn was in the complex and, you know, all she had to do
 [15] was pick up the phone and call.
 [16] Q Jocelyn?
 [17] A Jocelyn. And, you know, she was told that, LeAnn
 [18] told her she would help her, you know. I don't think she
 [19] availed herself of that much, though.
 [20] Q Now, Jocelyn Jolley was there, I believe you said,
 [21] two years before she ever went to correspondence.
 [22] A Yes, sir.
 [23] Q She was in legislative affairs.
 [24] A Yes, sir.
 [25] Q Everybody was happy with her work there.

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[1] A Yes, she did -- she was Lorraine Miller's personal
 [2] assistant, so she did a lot of her scheduling, answering
 [3] phones, sent photographs out. She did a lot of things --
 [4] she did a lot of things that were specific to one person.
 [5] Q [redacted]
 [6] [redacted]
 [7] A [redacted]
 [8] [redacted]
 [9] [redacted]
 [10] [redacted]
 [11] [redacted]
 [12] [redacted]
 [13] [redacted]
 [14] Q [redacted]
 [15] [redacted]
 [16] [redacted]
 [17] A [redacted]
 [18] [redacted]
 [19] Q [redacted]
 [20] [redacted]
 [21] A [redacted]
 [22] [redacted]
 [23] [redacted]
 [24] [redacted]
 [25] [redacted]

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[1] [REDACTED]
 [2] [REDACTED]
 [3] [REDACTED]
 [4] [REDACTED]
 [5] [REDACTED]
 [6] [REDACTED]
 [7] [REDACTED]
 [8] Q Did she seem surprised when you told her -- I
 [9] assume you told both Monica and Jocelyn that they were going
 [10] to be removed?
 [11] A Yes, sir, I did.
 [12] Q Did you tell them separately?
 [13] A I told them together?
 [14] A Okay. And did [REDACTED] seem surprised?
 [15] A I don't know if she seemed surprised. I think -- I
 [16] think they both knew it was coming. She left me a voice mail
 [17] message afterwards.
 [18] Q [REDACTED]
 [19] A Yes, sir, she did, that wasn't you know -- it
 [20] wasn't -- it wasn't too nice, but then --
 [21] Q All right. And what was that voice mail message?
 [22] A You know, it was -- she felt that I didn't treat
 [23] her fairly and that she was a good and loyal staff person
 [24] and that, you know, she just was not happy with -- with
 [25] having to leave.

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[1] Q Had you warned her -- you said there were no
 [2] written reprimands or warnings in her file, correct?
 [3] A That's correct.
 [4] Q Had you warned her that she might be fired if her
 [5] behavior continued?
 [6] A What I had to said to them, and said to them both
 [7] on numerous occasions, was this couldn't continue like this.
 [8] You know, I had -- and --
 [9] Q What couldn't?
 [10] A The lack of performance, the absence, the not
 [11] answering phones, the wandering around the old building, the
 [12] -- you know, taking -- instead of taking one letter to the
 [13] Hill -- taking a pack of letters to the Hill for delivering,
 [14] taking one letter and taking several trips a day, just to be
 [15] out of the office.
 [16] There was -- I mean, there was a pattern. And I
 [17] told them it couldn't -- it couldn't continue. They were
 [18] both aware of that.
 [19] And just as -- you know, I think if I was going to
 [20] quote/unquote fire them in the sense of, "You're fired, leave
 [21] today, clean out your desk," and have, you know, security
 [22] walk them out, you know, yeah, would I have probably given
 [23] them a written reprimand beforehand or something of that
 [24] nature? I probably would have.
 [25] But quite honestly, they were placed somewhere else

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[1] for another chance. And when I talked to them that day,
 [2] that's what I told them -- that they both were getting a
 [3] second chance.
 [4] Q You said that you told each of them this couldn't
 [5] continue, correct?
 [6] A Before that day, yes, sir.
 [7] Q Right. But had you told either one of them
 [8] that they were going to be fired if they continued a
 [9] particular behavior?
 [10] A I don't think I ever used that term, no, sir.
 [11] Q Okay. Did you tell them they were going to
 [12] be removed?
 [13] A I don't think I ever said that, either.
 [14] Q Okay. Tell us about the firing. How soon after
 [15] Evelyn told you to get rid of them did you tell them they
 [16] were going to be removed?
 [17] A I didn't do it -- I didn't tell them until I
 [18] had it done.
 [19] Q What do you mean by that?
 [20] A I went to talk to Bob Nash and Patsy.
 [21] Q Okay.
 [22] A And I told them that I had to place two people,
 [23] that I was getting rid of them, that there were some
 [24] problems, and that -- that it was time to see if we
 [25] can get them somewhere else.

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[1] [REDACTED] had a far more problem with work
 [2] performance than did Monica, in the sense that, you know,
 [3] she had a longer pattern of not getting the job done. I
 [4] think she was --
 [5] Q As I understand you, even though a lot of Monica's
 [6] problem was caused by the fact that she was hanging around
 [7] the West Wing too much, there were also substantive
 [8] problems. You mentioned, for instance, taking one
 [9] letter at a time to deliver.
 [10] A Yeah. Right. The job wasn't getting done, and
 [11] part of the reason the job wasn't getting done was this
 [12] nonsense, you know. That's --
 [13] Q What is "this nonsense"?
 [14] A I mean, the -- you know, the taking --
 [15] Q Scenic tour?
 [16] A The scenic tours, the -- you know, the -- just the
 [17] inability to organize oneself to -- you know, if you're going
 [18] to take one letter to autopen, why don't you print the other
 [19] 25 that are right behind it.
 [20] Q Okay. You were starting to say that it was more
 [21] difficult to place [REDACTED].
 [22] A Yes.
 [23] Q Okay.
 [24] A Yeah. Even the placement was different. She was
 [25] put at -- she went over to GSA on a 120-day appointment -- a

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[1] probation type of a job.
 [2] Q Okay. Did she know that?
 [3] A Yes.
 [4] Q That it was probationary?
 [5] A Oh, yeah.
 [6] Q Who told her that?
 [7] A I did.
 [8] Q And did Patsy Thomasson know that --
 [9] Patsy Thomasson know that it was probationary?
 [10] A Yes, it was a 120-day assignment. So that's -- and
 [11] I think she was upped one other time. And the first 120 days
 [12] she did well, then slipped back into a pattern, and I know
 [13] she was -- she was let go from GSA.
 [14] Q Why did Monica get a better assignment than
 [15] [REDACTED]?
 [16] A Because she was a kid that didn't make the
 [17] transition between a intern and a staff person. And she --
 [18] she made some stupid mistakes, but I think by and large, she
 [19] was -- she could get the job done, if she didn't have other
 [20] distractions. And she was given a second chance. She needed
 [21] a shaking up.
 [22] Q Okay. What did you tell Patsy Thomasson?
 [23] Patsy Thomasson is the only or primary person you worked
 [24] with in presidential personnel to place these women?
 [25] A As I remember it, I talked to Patsy Thomasson and

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[1] Bob Nash. But I think I talked to them together, and any
 [2] follow-up was with Patsy.
 [3] Q What did you tell them about the problems, if any,
 [4] with these employees? Let's start with Monica Lewinsky.
 [5] A I -- well, you asked me the term "clutch" before.
 [6] I think I probably said that with Monica.
 [7] Q Okay.
 [8] A I probably said that with Monica to Patsy. She --
 [9] she was a clutch. There was a problem there.
 [10] Q Other than the clutch/scenic route problem, did you
 [11] discuss with anybody in presidential personnel the other
 [12] performance problems of Monica Lewinsky?
 [13] A I discussed the problem that I was having in the
 [14] office. And the problem in the office was that the job
 [15] wasn't getting done.
 [16] If the job wasn't getting done, you know, one of
 [17] the reasons was that, you know -- from Monica was that, you
 [18] know, she was a clutch, she was trying to get into events,
 [19] she was walking around too much.
 [20] The reasons for [REDACTED] was she just wasn't showing
 [21] up for work. When she was -- when came in, she would leave
 [22] early. You know, there -- you know, yeah, I talked about
 [23] those problems.
 [24] Q Did you also mention, if you recall, to
 [25] Patsy Thomasson to OMB incident -- I take it the OMB

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[1] incident -
 [2] A It was known, yes, sir.
 [3] Q Okay.
 [4] A And that's - and she had - I think Patsy even
 [5] confirmed with Jodie about the OMB.
 [6] Q Okay. The OMB incident involved both
 [7] Monica Lewinsky and [REDACTED] is that correct?
 [8] A Well, that's my - that was the correspondence
 [9] unit. So the correspondence unit didn't task these letters.
 [10] So yeah, it involved them both. I mean, there were two
 [11] people in that office every day, opening the mail, deciding
 [12] which pile it goes in. I mean, they didn't - they didn't
 [13] decide to - you can't separate them.
 [14] Q Okay. Did you discuss - in addition to the OMB
 [15] incident with Patsy Thomasson - this phenomenon of Monica
 [16] delivering one letter at a time, one piece of correspondence
 [17] at a time?
 [18] A I probably - I probably talked to her about, you
 [19] know, that type of material. It's just that I don't remember
 [20] my exact words to Patsy, but -
 [21] Q Okay. What I'm trying to get a bead on, if you
 [22] recall, is when you talked about Monica Lewinsky with Patsy,
 [23] did you say that it was exclusively - her exclusive
 [24] problem, which also impinged on her work, was that she
 [25] took scenic tours, or that there were also things where

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[1] she couldn't -
 [2] A No.
 [3] Q - cut it at work?
 [4] A No, there wasn't an exclusive problem. There were
 [5] problems that led to this office not functioning properly.
 [6] Q I take it, your discussion with Patsy from
 [7] the git-go, and with Bob Nash, was about both of
 [8] these employees.
 [9] A Yes, sir.
 [10] Q In other words, it's not a coincidence that they
 [11] both happened to be removed on the same day.
 [12] A It was - I planned it that way.
 [13] Q Okay. And that's because they weren't operating
 [14] their office properly?
 [15] A Correct. The office was being run poorly, and if
 [16] I'm going to make that type of a move, you know, this whole
 [17] operation needs to be pulled apart and then put back together
 [18] new. I needed them both out of there.
 [19] Q Would you expect the person who Monica was placed
 [20] with to have been told both about her performance problems
 [21] and her clutch problem?
 [22] A I think that - I wouldn't - you know, I didn't do
 [23] that routinely. No, I didn't talk to anybody over at DOD.
 [24] So I don't - I mean -
 [25] Q That wasn't your function?

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[1] A It wasn't my function but, you know, I'd want
 [2] to know.
 [3] Q If you were her new employer or her new supervisor?
 [4] A You know, sure, I would want to know. But, you
 [5] know, I think the - I think the problem here is that
 [6] Monica was a very bright person that had potential. It's
 [7] just that I think she was in the wrong situation. She was in
 [8] the wrong environment. In other words, she was star-struck
 [9] by anything and everything.
 [10] Q Tell us about the actual day that you told them
 [11] that they were going to be moved.
 [12] A It was right before Easter, probably late morning,
 [13] noon. And I can't remember if it was the Thursday before
 [14] Easter or the Friday before Easter. I know it was either one
 [15] of those days. I just can't remember when I went home.
 [16] I can't tell, because I did it - I got it all put
 [17] into place, and I pulled them in, and I said, you know, "You
 [18] know, the office hasn't been running properly. You know it,
 [19] I know it. We've had complaints."
 [20] I talked to them about the - you know, the
 [21] set of letters and that they were going to have to leave;
 [22] that no one would be told that they were fired. They're not
 [23] fired; they're just being given a different opportunity. In
 [24] fact, they could tell them it was a promotion, if they would
 [25] like. I wasn't going to, you know, talk to anybody about

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[1] that within the office.
 [2] And I wanted to handle it quietly, but I didn't
 [3] want them to be embarrassed. They had, you know, ample time
 [4] to check out. Nobody was going to follow them from point A
 [5] to Point B.
 [6] Q What do you mean by "ample time"?
 [7] A You know, when you - when you - "If it takes
 [8] you today to close out, I'd like you to close out. If you
 [9] need to come to tomorrow and - whatever. Just you have to
 [10] - you have to go through a check-out procedure to leave the
 [11] White House.
 [12] Q But it wasn't like one week or two weeks?
 [13] A No, sir. No, sir. It is, you know, take the rest
 [14] of the day, do it.
 [15] Q In other words, they weren't escorted from their
 [16] desk immediately?
 [17] A Correct.
 [18] Q All right. They were given a day.
 [19] A Yes, sir.
 [20] Q Okay.
 [21] A And I did it on a day where a lot of people were
 [22] not really around, that they didn't have to be embarrassed,
 [23] if they were embarrassed.
 [24] Q Were they surprised?
 [25] A I don't think so.

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[1] Q Okay.
 [2] A I mean, I - the funny part is when I asked them
 [3] both to come over, I mean, think they said, "I think we know
 [4] what this is about."
 [5] Q Who said that?
 [6] A I think it was [REDACTED].
 [7] Q Okay. But -
 [8] A But they had clearly talked about on the way over.
 [9] Q Well, do you know whether or not that they were
 [10] referring to getting moved, or to the OMB incident?
 [11] A I think they were thinking this was - this
 [12] was the end.
 [13] Q All right. But they didn't articulate that to you?
 [14] A No, sir.
 [15] Q All right. I asked you if they were surprised.
 [16] You said you didn't think so.
 [17] A No, sir.
 [18] Q Were they upset, either one of them?
 [19] A Yes.
 [20] Q Okay. What was the reaction of Monica Lewinsky?
 [21] A Tears.
 [22] Q All right.
 [23] A Yeah, she -
 [24] Q What do you recall her saying?
 [25] A Not - not much during - I mean, just - we went

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[1] through, I told her that she was going to go to DOD, and that
 [2] she had to go meet with, I think it was Patsy, the following
 [3] week. And [REDACTED] was going to have a - you
 [4] know, she was going to go to GSA.
 [5] And then I talked to them both separately
 [6] afterwards. And I told [REDACTED] that, you know, she had
 [7] 120 days, you know, to straighten herself out, and I hoped it
 [8] worked; if she needed any help, I'd help her.
 [9] And then I talked to Monica afterwards, and Monica
 [10] was - you know, she asked if she could stay, and I said no.
 [11] And she asked if she could stay as a volunteer, and I said
 [12] no. She asked if she could stay as an intern, and I
 [13] said no.
 [14] She - you know, she wanted to stay. And I told
 [15] her that - that, you know, this didn't prohibit her from
 [16] coming back into the White House at some point; that she
 [17] needed to grow up; that she needed to go over to DOD, do a
 [18] good job, and then, you know, at some point, she may be
 [19] able to get a job back in the White House. But not now.
 [20] Q Did you tie that to a specific time period?
 [21] A No, sir.
 [22] Q Did you tell her she'd be able to come back after
 [23] the election?
 [24] A No, sir.
 [25] Q All right. You say that Monica Lewinsky then wrote

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[1] you a note -
 [2] A She did, sir.
 [3] Q A few days later.
 [4] A Yes, sir.
 [5] Q To the best of your recollection, what did that
 [6] note say?
 [7] A It was - it was a rambling note type of, you know
 [8] - you know, "I'm - " you know, "I want to come back."
 [9] She offered to come back as a volunteer again.
 [10] Q I want to know everything you remember about
 [11] the note.
 [12] A The one thing - the only - the one thing I
 [13] remember about the note is - is a line that she had wrote
 [14] that, "This job was my everything."
 [15] You know, she had told all of her friends. She was
 [16] - (shrugging). You know, she wanted to come back in. You
 [17] know, it was embarrassing for her to be shipped off, and she
 [18] wanted to come back in; would I consider it. I didn't
 [19] respond to the note and -
 [20] Q Did she try to pull any rank on you? I mean,
 [21] obviously, she wasn't higher than you, but did she try to
 [22] pull any rank?
 [23] A No, sir.
 [24] Q Was there any feedback from the decision to move
 [25] Monica Lewinsky?

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[1] A Zero.
 [2] Q Okay. Did anybody ever tell that you anybody other
 [3] than Monica was upset about it?
 [4] A And Jocelyn. Other than that, no, sir.
 [5] Q Did Evelyn Lieberman ever tell you that the
 [6] President asked about who had moved Monica Lewinsky?
 [7] A No, sir.
 [8] Q Did Monica Lewinsky ever call you on the phone
 [9] about coming back?
 [10] A Yes, sir.
 [11] Q How many times?
 [12] A Within that - within the first week or so - week
 [13] or two weeks, she probably called two or three times.
 [14] Q And what did she say?
 [15] A Giving me a progress report on, you know, going
 [16] over to the Pentagon; that, you know, she wasn't set yet;
 [17] she was - you know, she was - there was a few days for the
 [18] paper paperwork to catch up and, you know, asking me to come
 [19] back as a volunteer.
 [20] Q During the two- to three-day interim?
 [21] A No, sir.
 [22] Q Or just forever?
 [23] A Just in general.
 [24] Q Okay.
 [25] A That she would - she would give up any pay to come

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[1] back and prove herself within the White House. You know,
 [2] that her proving ground shouldn't be somewhere other than
 [3] the White House.
 [4] Q All right. As I understand it, basically, she
 [5] cried when you told her, basically begged you to stay.
 [6] A Yes, sir.
 [7] Q Wrote you a letter asking to stay.
 [8] A Right.
 [9] Q Called you a few times during the first week,
 [10] asking you if she could stay.
 [11] A Yes, sir.
 [12] Q But you don't think she was surprised by your
 [13] decision to move her?
 [14] A No, I don't. I - I - I think that - well,
 [15] they knew that there was a problem and I - you know, I mean,
 [16] because I was over there poking around, seeing what else was
 [17] messed up. So they knew that there was a problem within the
 [18] - you know, the week or so.
 [19] You know, I - I don't think that they were - I
 [20] really don't think they were surprised. I think that they
 [21] were unhappy. I think that they - they would have loved to
 [22] have had it changed.
 [23] You know, as I said, Jocelyn left me a voice mail
 [24] message, you know. Monica wrote me a note. They - they
 [25] both didn't leave, but -

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[1] Q Let me ask you a question.
 [2] A Yes, sir.
 [3] Q Would you have moved them when you moved them, if
 [4] Evelyn Lieberman had not ordered you to do it?
 [5] A Well, it was a - it was a discussion with Evelyn,
 [6] as well, but at that point? Yes. Yes.
 [7] Q Okay.
 [8] A The job wasn't getting done. I - as I said, I had
 [9] a new boss who, you know, had just come in and, you know, I
 [10] didn't need that headache either.
 [11] Q Okay. So even if Evelyn had not told you to fire
 [12] them after your discussions with Evelyn and Jodie Torkelson,
 [13] you would have done it yourself?
 [14] A I think I would have moved them myself, yeah.
 [15] There was a - there was a problem in that shop that needed
 [16] to be corrected.
 [17] Q All right. I want you to consider all of our
 [18] questions carefully, of course -
 [19] A Yes, sir.
 [20] Q - but I want you to listen to this one very
 [21] carefully. If there's anything you don't understand about
 [22] it, please let me know.
 [23] A Yes, sir.
 [24] Q Was the removal of [REDACTED] in any way,
 [25] shape, or form cover for the removal of Monica Lewinsky?

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[1] A Absolutely not.
 [2] Q As far as you knew.
 [3] A As far as I knew.
 [4] Q Did you hear anything, prior to the removal of
 [5] [REDACTED] and Monica Lewinsky, about the President being
 [6] caught kissing Monica Lewinsky?
 [7] A Never.
 [8] Q Did you ever see Monica Lewinsky alone with the
 [9] President Clinton?
 [10] A No, sir.
 [11] Q Did you ever see her enter a room where you thought
 [12] President Clinton had been beforehand?
 [13] A No, sir.
 [14] Q Did you ever her enter a room where you thought
 [15] President Clinton had been beforehand?
 [16] A No, sir.
 [17] Q Did you ever see her leave a room where you thought
 [18] President Clinton was beforehand?
 [19] A No, sir.
 [20] Q Did you ever see him enter a room where you thought
 [21] or found out she was there beforehand?
 [22] A No, sir.
 [23] Q Did you ever see him leave a room where you thought
 [24] or found out she was there beforehand?
 [25] A No, sir.

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[1] Q When you told -
 [2] A I assume you mean alone. I mean, you know, we'd
 [3] been into -
 [4] Q Yes.
 [5] A - groups for photos and things like that.
 [6] Q Yes.
 [7] A Okay.
 [8] Q Yes.
 [9] A All right.
 [10] Q Did you hear from anybody - let's talk about
 [11] before the last month or so, when this has become a huge
 [12] public phenomenon.
 [13] A Yes, sir.
 [14] Q Did you at any time hear from anybody -
 [15] first-hand, second-hand, third-hand, eighteenth-hand -
 [16] A Twentieth-hand.
 [17] Q - that there was a relationship of some kind - a
 [18] romantic relationship, sexual relationship - between
 [19] President Clinton and Monica Lewinsky?
 [20] A I'm trying to - trying to remember - I mean,
 [21] there's 10,000 rumors that float around the place that you
 [22] - you may hear and dismiss because of the credibility of
 [23] the people who spread such rumors. You know, may I have?
 [24] I may have. But if I had, I probably dismissed it.
 [25] Q Okay. The -

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[1] A I mean, I know that's not answering the question
 [2] really, but that's probably about the best I can -- that's
 [3] probably the best answer I have for it.
 [4] Q Was it generally known among more people than
 [5] you, Jodie Torkelson, and Evelyn Lieberman that Monica
 [6] was a clutch?
 [7] A Oh, sure. The --
 [8] Q Okay. Did fact -- go ahead.
 [9] A The clutch is showing up at events, or trying to
 [10] get into events, or just appearing. And, you know, anybody
 [11] that's at an event can kind of figure out who it is.
 [12] Q My question was rather broad, and you said that
 [13] somebody -- there were a lot of rumors going around; there
 [14] could have been a rumor by a person you didn't consider
 [15] credible. Let's talk about people that you consider
 [16] to be credible.
 [17] A Yes, sir.
 [18] Q And let's talk about within the offices of the
 [19] chief of staff and the office of legislative affairs.
 [20] A Yes, sir.
 [21] Q And my question to you is: Was there speculation
 [22] by credible people, based upon what was known about Monica
 [23] being a clutch -- was there speculation that there might be
 [24] an affair between Monica Lewinsky and President Clinton?
 [25] A I don't think I heard -- ever heard anyone say that

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[1] that Monica Lewinsky got placed in a job that would cause her
 [2] to have frequent visits to the West Wing? I'm not saying
 [3] that happened, but would you be concerned, given one of the
 [4] reasons why she was moved --
 [5] A I think that Monica needed to be shaken up. And
 [6] the move in itself, I think, was enough to make her move from
 [7] the intern level to the staff level. And that's what needed
 [8] to happen to her. So the answer to that would be no.
 [9] Q Okay. That would not have concerned you?
 [10] A No, sir, I don't think it would have.
 [11] Q Okay. And --
 [12] A I mean, as long as she's not working in the West
 [13] Wing. If she had a -- if she had a position that -- that --
 [14] I think she just needed to be moved and shaken up a bit; that
 [15] -- you know, you need to make a transition.
 [16] Q Would it concern you if you found out -- I'm not
 [17] saying this is true.
 [18] A Yes, sir.
 [19] Q Would it concern you to find out that in the year
 [20] and a half after she left the White House and went to the
 [21] Pentagon, that there were approximately 20 times when she
 [22] was spotted in the West Wing and where it had absolutely
 [23] no relation to her job at the Pentagon?
 [24] A Would that what? I'm sorry, I --
 [25] Q Would that concern you, given what you knew about

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[1] there was an affair between them -- anyone saw an affair,
 [2] that anyone heard of an affair.
 [3] Q But that wasn't the question.
 [4] A Yes, sir.
 [5] Q Was there speculation that might be an affair
 [6] or might be a sexual relationship of some kind in those
 [7] two offices?
 [8] A Not to my knowledge.
 [9] Q Okay. You don't remember discussing that
 [10] with anybody?
 [11] A No.
 [12] Q When you were talking with Monica Lewinsky and
 [13] Jocelyn Jolley and telling them that they could even tell
 [14] people, as I understand it, that their removal/placement
 [15] could be a promotion --
 [16] A Sure. I said to put the best light on it.
 [17] Q Okay. -- did you ask either one of them to
 [18] complete paperwork indicating that it would be a promotion?
 [19] A No, sir.
 [20] Q Okay. Do you know what a separation form is?
 [21] A Yes, I do.
 [22] Q Okay. Did you convince Jocelyn Jolley that
 [23] she should write on her separation form that she was
 [24] being promoted?
 [25] A No, I didn't convince anyone. I --

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[1] the reasons she was transferred?
 [2] A Not -- not necessarily.
 [3] Q And why is that?
 [4] A You're going in to see friends, you go in for lunch,
 [5] you -- you know. I mean, I -- I've been gone from the
 [6] White House for over a year, and I've been in there more
 [7] than 20 times.
 [8] I -- you know, I mean, it depends on what context.
 [9] To see someone in the West Wing does not necessarily -- is
 [10] not necessarily a bad thing.
 [11] Q Meaning no disrespect to Ms. Lewinsky, you're a
 [12] higher-level person that she is; is that correct?
 [13] A Yes, sir.
 [14] Q And even now, you're a partner at one of the
 [15] premier lobbying firms in the city; is that correct?
 [16] A Yes, sir, it is.
 [17] Q The --
 [18] A I mean, I -- it depends on who her friends were and
 [19] whether they were going out. I mean, I -- you know, I had a
 [20] lot of kids that left -- not under her circumstances, but a
 [21] lot of kids that left that came back. They still go back.
 [22] Q Let me ask you this: Did you ever see her in the
 [23] West Wing after --
 [24] A Yes, sir.
 [25] Q -- she left?

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[1] Q Did you suggest it?
 [2] A When I talked to them, what I said was that, "You
 [3] know, you can portray this as a promotion, if you'd like, to
 [4] people." I didn't want them to be embarrassed.
 [5] Q Did you authorize Jocelyn Jolley on her separation
 [6] form to say that she had been promoted?
 [7] A No, I don't know even know what she put on her
 [8] separation form.
 [9] Q The --
 [10] A Because it's not -- technically, it's not a
 [11] promotion if you put in a separation form. I mean,
 [12] you're separating. You can -- you have a list a
 [13] reason for separation.
 [14] I wouldn't -- I wouldn't think most people would
 [15] put "promotion." I think most people would put, you know,
 [16] "moved to a different agency." I don't know what she put on
 [17] her separation form, though.
 [18] Q But your answer is no, you didn't authorize her --
 [19] A No, sir.
 [20] Q -- to put that on her separation form?
 [21] A No, sir.
 [22] Q Did you authorize her to put that on any government
 [23] form -- that she had been promoted?
 [24] A No, sir.
 [25] Q Okay. Would you have been concerned to find out

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[1] A Yes, sir.
 [2] Q How many times?
 [3] A And I -- it's -- when I say the West Wing --
 [4] because a lot of times -- and I've seen her a couple times,
 [5] but a lot of times where I would see her would be going out
 [6] onto the West Exec --
 [7] Q Let's say White House then.
 [8] A White House is a better term for me.
 [9] Q Okay. How many times did you see her in the
 [10] White House after she was at the Pentagon?
 [11] A Probably about four five times.
 [12] Q All right. Did any of those -- how soon after
 [13] she left?
 [14] A I don't know. Probably within -- probably within a
 [15] month or two.
 [16] Q Did this concern you at all?
 [17] A No, I saw her -- I -- I mean, I think I saw her out
 [18] on West Exec. And I just asked --
 [19] Q Did this concern you at all?
 [20] A No. I asked her how the job was doing and how
 [21] she was doing. And, you know, I was running to a car,
 [22] you know, just --
 [23] Q You were running to go to a car?
 [24] A Yeah, I -- I mean, that's -- the cars was line up
 [25] right outside West Exec and, you know, part of my job was to

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[1] be on the Hill, back and forth a lot.
 [2] Q Did you ever hear that Evelyn Lieberman saw Monica
 [3] in the White House after Monica was sent to the Pentagon and
 [4] was upset about it?
 [5] A No, sir.
 [6] Q Did you ever hear that Evelyn Lieberman saw
 [7] Monica in the White House, period, after Monica went
 [8] to the Pentagon?
 [9] A After Monica went to the Pentagon, I never had
 [10] another conversation with Evelyn Lieberman about it or talked
 [11] to anybody about Evelyn Lieberman (sic) in this.
 [12] Q This is a person who was so willing to stay at the
 [13] White House that she offered to work there as a volunteer,
 [14] and you saw her four or five times within the first month of
 [15] her going to the Pentagon --
 [16] A No, no. I said I saw her --
 [17] Q Well, let me finish, and you can tell me if I'm
 [18] wrong about something.
 [19] You saw her four or five times within the first
 [20] month, and you weren't concerned?
 [21] A No, that's not -- you may have misunderstood me.
 [22] Q Okay.
 [23] A I said I saw her four or five times in the
 [24] remaining two years that I was the White House.
 [25] Q Okay.

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[1] A And I saw her within the first month or so.
 [2] Q On one occasion?
 [3] A Yes, sir.
 [4] Q Okay.
 [5] A I apologize for that.
 [6] Q Okay. It might not have been your problem; it
 [7] might have been my problem.
 [8] Do you ever recall discussing Monica Lewinsky with
 [9] Jennifer Palmieri?
 [10] A Sure. Jennifer recommended her.
 [11] Q Do you ever recall discussing Monica as a clutch
 [12] problem with Jennifer Palmieri?
 [13] A Not necessarily, but I -- I potentially could have.
 [14] Q Do you ever recall speculating with
 [15] Jennifer Palmieri about whether or not there was
 [16] possibly an affair of some kind --
 [17] A No.
 [18] Q -- between Monica and the President?
 [19] A No, sir.
 [20] Q Okay. You testified that you worked this
 [21] thing out.
 [22] A Yes, sir.
 [23] Q The new --
 [24] A I talked to Patsy, and by the time they got the
 [25] process done and, you know, everything was --

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[1] Q Okay. How soon before you told Monica and Jocelyn
 [2] that they were going to be removed did you --
 [3] A Tell them they had to leave?
 [4] Q Yes.
 [5] A However long it took. Probably a week.
 [6] Q Or did you tell Patsy? Did you go to Patsy? How
 [7] soon before you told Jocelyn and Monica did you go to Patsy
 [8] and Bob Nash and try to set up the new job?
 [9] A No, no, I did that first.
 [10] Q What?
 [11] A Talked to Evelyn, talked to Bob and Patsy. When
 [12] things were worked out, which probably took about a week --
 [13] Q Okay. That was my question.
 [14] A Yes, sir.
 [15] Q In other words, about a week before you told Monica
 [16] and Jocelyn that they were going to be removed -- about a
 [17] week before that is when you went to Patsy and Bob Nash?
 [18] A Yes, sir. Yes, sir.
 [19] Q Okay. I know it's difficult for you --
 [20] A I'm fine.
 [21] Q You're doing all right?
 [22] A Yes, sir.
 [23] Q Okay. I am going to have to ask you to step
 [24] outside for just a moment while I talk to the grand jurors.
 [25] A Okay, sir.

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[1] Q And I'll come and get you.
 [2] A Okay.
 [3] (The witness was excused and recalled.)
 [4] MR. WISENBERG: Let the record reflect that
 [5] Mr. Keating has reentered the Grand Jury room. Do we have
 [6] quorum, Madame Foreperson?
 [7] DEPUTY FOREPERSON: Yes, we do.
 [8] MR. WISENBERG: Any unauthorized persons in the
 [9] Grand Jury room?
 [10] DEPUTY FOREPERSON: None.
 [11] MR. WISENBERG: Anything you want to remind the
 [12] witness of?
 [13] DEPUTY FOREPERSON: Mr. Keating, I need to remind
 [14] you you're under oath.
 [15] THE WITNESS: Thank you.
 [16] BY MR. WISENBERG:
 [17] Q Let me start by asking you -- I asked you a general
 [18] question about whether or not you had heard speculation about
 [19] an affair.
 [20] Did you witness an incident or hear about an
 [21] incident -- during any of your time in the White House --
 [22] that led you, yourself, to speculate that there might be
 [23] something going on between Monica Lewinsky and the President?
 [24] A I never witnessed anything. I had heard probably
 [25]

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[1] fourth- or fifth- or sixth-hand that -- that she saw the
 [2] President after she was dismissed, and that was -- that was
 [3] that. I never heard any more than that about it.
 [4] Q So what do you mean "saw" the President after she
 [5] was dismissed?
 [6] A That -- the rumor was that she came in the Saturday
 [7] after she was dismissed and saw the President and asked if
 [8] -- if he would help get her job back -- or saw Betty, or
 [9] saw someone.
 [10] That was the -- that was the rumor. But nothing
 [11] ever came of it, and I never -- never proved it, never heard
 [12] of it again.
 [13] Q Who did you hear the rumor from?
 [14] A Probably somebody on the staff -- my staff, who
 [15] said that they had heard --
 [16] Q Do you remember who?
 [17] A Speculation, it probably would have been
 [18] Chris Walker.
 [19] Q All right.
 [20] A Because he was the one that actually replaced
 [21] Jocelyn and Monica. So, you know, -- you know, it was one of
 [22] these things that may not necessarily be credible. You know,
 [23] it's one of these things where he didn't see it, he heard it,
 [24] who heard it --
 [25] Q Tell me everything else about the rumor, in

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[1] the sense that, other than the fact that she visited the
 [2] President and asked for him to reverse the decision --
 [3] A That was all that I heard about it.
 [4] Q Okay. Did you ever see Jocelyn Jolley's separation
 [5] form?
 [6] A No, sir, I don't think I did.
 [7] Q Did you ever personally witness Monica taking the
 [8] scenic route?
 [9] A No, sir.
 [10] Q Did Evelyn, as far as you know?
 [11] A She talked to me about it, so I assume she did.
 [12] Q Evelyn would have been in a position to see
 [13] it, correct?
 [14] A Well, not -- well, yeah, just for the simple reason
 [15] that this is very close over in here (indicating). And, you
 [16] know, while Evelyn's office is blocked in the corner and
 [17] she really can't see out into the hallway, there's lot of
 [18] movement between Leon's office and her office, or you know
 [19] -- you know, just out in that corridor.
 [20] So sure, I'm sure she -- you know, Evelyn's office
 [21] was an interior office. It didn't have a window, it didn't
 [22] have a hall view. It had a view out into the -- out into a
 [23] reception area.
 [24] But, you know, the Roosevelt Room was right here,
 [25] where there was an awful lot of -- that's the room that

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[1] generally staff meet in or they bring people, was the
 [2] Roosevelt Room. So you'd have to come out in the hall
 [3] and go that way.
 [4] Q Did Evelyn tell you she had seen Monica take the
 [5] scenic route?
 [6] A Yeah. Yes, sir.
 [7] Q Who is Jim Dorskind?
 [8] A Jim Dorskind was the director of correspondence for
 [9] the White House.
 [10] Q Did he make any complaints to you about Jocelyn or
 [11] Monica Lewinsky?
 [12] A I'm sure he did.
 [13] Q All right. Do you recall what they were?
 [14] A I don't, because Jim Dorskind -- you know, that was
 [15] always a source of friction between -- Jim Dorskind is in
 [16] charge of presidential correspondence, and I have an office
 [17] that's in charge of congressional correspondence.
 [18] So technically, it's kind of taking away his --
 [19] some of his -- his authority to do correspondence. So there
 [20] was always a little friction as to, you know, who did what
 [21] and -- so, you know, I --
 [22] Q Okay. But you can't recall an incident of him
 [23] complaining about Monica Lewinsky?
 [24] A Not -- not necessarily.
 [25] Q Or Jocelyn Jolley?

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[1] A No, I -- I can't -- I couldn't point to a
 [2] specific incident.
 [3] Q How about Chris Walker?
 [4] A I know Chris. Chris --
 [5] Q No, do you recall Dorskind making any complaint
 [6] about Chris Walker or something Chris Walker had done?
 [7] A He probably did, sure.
 [8] Q But you don't have a recollection of it?
 [9] A Of something that Chris did that Jim would
 [10] complain about?
 [11] Q Right.
 [12] A I don't specifically remember Jim -- but I'm sure
 [13] he did. I mean, I -- that happened a lot. And it happened
 [14] with LeAnn before him.
 [15] Q Are you aware of any occasion when the President
 [16] came to office of legislative affairs and saw Monica Lewinsky
 [17] during the time she worked there?
 [18] A No, but it -- it could have happened. I can
 [19] explain why it could have happened.
 [20] Q Why could it have happened?
 [21] A When the President practices for the state of the
 [22] union address, he practices over in the East Wing in the
 [23] theater. And the restroom facility is right outside the
 [24] back, and you have to pass the correspondence office and you
 [25] have to pass the ticket -- the tour guides office.

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[1] So whenever the President was doing the state of
 [2] the union address, it wasn't unheard of for him to stick his
 [3] head in and wave at people.
 [4] Q Would you have expected staff members to make you
 [5] aware of a presidential visit?
 [6] A Not necessarily. I mean, something informal like
 [7] that -- him waving and them seeing him in the hallway -- no.
 [8] I mean, they might have said, you know, excitedly, you know,
 [9] they saw him, or -- you know, the interns.
 [10] But I don't -- I don't remember a specific instance
 [11] with Monica. Could it have happened? Sure, it could have.
 [12] Q Did you meet with Harold Ickes the night before
 [13] your interview with the FBI?
 [14] A Yes, I did.
 [15] Q Had that been a prearranged meeting?
 [16] A Yes, sir, it had.
 [17] Q All right. How soon before had it been arranged?
 [18] A Well, we had been putting each other on and off for
 [19] a while. We share a client.
 [20] Q All right. Is Mr. Ickes of friend of yours also?
 [21] A A very good friend.
 [22] Q So you've met him before? You've met him for
 [23] drinks?
 [24] A Oh, yes, sir. We've met for dinner.
 [25] Q And you've met him before for drinks?

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[1] A Oh, yeah, dinner, drinks -- he's a friend. He and
 [2] Janice Enright are both friends.
 [3] Q Is that the first point in time when you told him
 [4] you were going to be interviewed the next day by the FBI?
 [5] A Yes.
 [6] Q All right. At that meeting, or at that --
 [7] Yeah. I'm sure of that. I probably --
 [8] Q What did he say about that?
 [9] A The only thing he said was, you know, good luck and
 [10] tell the truth.
 [11] Q All right.
 [12] A That was, you know --
 [13] Q That's the full extent of your discussion?
 [14] A The full extent of it. We were talking about
 [15] asbestos legislation.
 [16] Q Okay. That's the full extent of your discussion
 [17] about your interview and the full extent of your discussion
 [18] about Monica Lewinsky on that night?
 [19] A Yeah. I mean, I think he may have said,
 [20] you know, "Are you nervous?" And you know, "Don't be
 [21] nervous. Just, you know, go in and answer everything as,
 [22] you know, truthfully as you can and, you know, don't -- you
 [23] know, you're a witness. Just give the truth."
 [24] And that's -- I mean, it was, you know -- could
 [25] it have been the exact words? No. Could it have been

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[1] 30 seconds longer? Sure, it could have. But that was
 [2] the -- the was the gist of what he said.
 [3] Q Okay. Other than saying go in and tell the truth,
 [4] did he implicitly or explicitly indicate in any way what you
 [5] should say?
 [6] A No, sir.
 [7] Q Did he implicitly or explicitly make any threats
 [8] to you?
 [9] A No, sir.
 [10] Q You heard me talk about our investigation early on
 [11] and what grounds we were covering, what our authority was,
 [12] when you first came in.
 [13] A Yes, sir.
 [14] Q Is there anything relevant to our investigation, as
 [15] I've described it to you, that you haven't told us?
 [16] A I can't think of anything.
 [17] Q Did Mr. Ickes ask you what you know about the
 [18] President and Monica Lewinsky during this meeting?
 [19] A No.
 [20] Q I want to show you something real quick.
 [21] A Yes, sir.
 [22] Q I'm going to show you JJ-1. It's a --
 [23] (Juror leaves room.)
 [24] MS. WIRTH: Sol, we're losing a juror.
 [25] MR. WISENBERG: Do we still have a quorum?

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[1] DEPUTY FOREPERSON: Mm-hmm.
 [2] MR. WISENBERG: Okay. Let the record reflect that
 [3] we still have a quorum. Is that true, Madame Foreperson?
 [4] DEPUTY FOREPERSON: Yes, it is.
 [5] BY MR. WISENBERG:
 [6] Q All right. Here is a memo to Timothy Keating from
 [7] Jocelyn Jolley, 10 November 1995. It's Exhibit JJ-1.
 [8] Cc: Susan Brophy and Patrick Griffin.
 [9] Subject: Staff Assistant.
 [10] "Will somebody please clue me in as to when Monica
 [11] will be starting? I'd prefer not to hear it through the
 [12] grapevine, which is how I learned Chris was leaving. Thanks
 [13] for the courtesy."
 [14] Do you recall receiving that?
 [15] A Now that I see it, yeah.
 [16] Q Here's JJ-2 -- apparently your response:
 [17] "I did not like the tone of your e-mail. If you
 [18] have a problem with the way the process is going, please pick
 [19] up the phone and call me."
 [20] A That's the way we did it generally.
 [21] Q And do you recall sending that to her?
 [22] A That's me.
 [23] Q Okay. So you recall?
 [24] A I -- yeah.
 [25] Q You don't have any reason to doubt you sent it?

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[1] A I mean, I sent it. I just -- you know, as I said.
 [2] this is not the highlight of my --
 [3] Q Well, I believe you said this morning that it's
 [4] quite possible that you did so. So I'm not trying to trick
 [5] you or --
 [6] A Oh, yeah, yeah. No. I'm -- I'm sure that's me.
 [7] it sounds like me.
 [8] Q November 10, 1995. That is Exhibit JJ-3, Jocelyn
 [9] to you:
 [10] "I'm glad we had a chance to talk things out.
 [11] Although I stand by my feelings, I truly apologize for
 [12] the tone of my e-mail. I realize now that it was
 [13] inappropriate. I'm the type of person who holds
 [14] things this until I explode. Today I exploded,
 [15] and I'm sorry I exploded on you."
 [16] "P.S. Ask [redacted] about the chip in his butt.
 [17] I think he had his operatives place one in mine. Therefore,
 [18] this explains my outburst today."
 [19] All right. Do you recall receiving this?
 [20] A Yeah.
 [21] Q Okay. Do you recall that you would have had a chat
 [22] with her about her e-mail to you, and the tone of it?
 [23] A Oh, I'm sure I did.
 [24] MR. WISENBERG: Are there any questions by the
 [25] grand jurors?

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[1] THE WITNESS: Yes, ma'am?
 [2] A JUROR: Okay. The situation with Jocelyn Jolley
 [3] and the OMB correspondence --
 [4] THE WITNESS: Yes, ma'am?
 [5] A JUROR: -- around what time was that, in terms
 [6] of dates?
 [7] THE WITNESS: You mean the date that OMB -- that I
 [8] found out about the OMB? It was probably --
 [9] A JUROR: When it wasn't sent -- whatever time it
 [10] wasn't sent. When it wasn't sent.
 [11] THE WITNESS: What -- the letters, you mean?
 [12] A JUROR: Mm-hmm.
 [13] THE WITNESS: It was a -- it was a stack of
 [14] letters. It wasn't one letter, two letters, three -- it was
 [15] a stack of letters.
 [16] MR. WISENBERG: Is your question how long was the
 [17] delay, or when did OMB complain? Is your question: When did
 [18] OMB complain about it?
 [19] A JUROR: Yeah. Or when did he hear about it --
 [20] around what time?
 [21] THE WITNESS: It was -- around what --
 [22] A JUROR: Was it around the time when you had the
 [23] budget crisis or --
 [24] THE WITNESS: No, no. The problem with OMB finding
 [25] these letters was about a week before they were dismissed.

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[1] About a week before they were -- you know, that was -- that
 [2] was the final thing that caused us to -- to move them.
 [3] A JUROR: Was that before the budget crisis,
 [4] or after?
 [5] THE WITNESS: Oh, it was after. It was -- the
 [6] budget crisis occurred in December, and this was in April.
 [7] A JUROR: Okay. Were you aware that somebody at
 [8] the OMB had advised Jolley to hold onto any correspondence?
 [9] THE WITNESS: That's not -- that's -- a) that
 [10] wouldn't be proper of them to do that; b) if they had done
 [11] that, she should have told me that; and c) that's just not
 [12] the way it's done.
 [13] The President of the -- these are letters to the
 [14] President of the United States. Her responsibility is to
 [15] make sure that they're answered and they get out the door --
 [16] or get to his desk, I should say, in a timely fashion.
 [17] A JUROR: So you're saying that she never told
 [18] you this?
 [19] THE WITNESS: Yes, ma'am. That's correct.
 [20] BY MR. WISENBERG:
 [21] Q Yes, she never told you?
 [22] A Yes, she never told me.
 [23] MR. WISENBERG: Yes, ma'am.
 [24] A JUROR: Well, that was kind of my question. Did
 [25] you ask her why these weren't sent? I was wondering what her

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[1] explanation was why that one batch --
 [2] THE WITNESS: They never really -- it wasn't
 [3] one batch. It took -- when they left the office, it took
 [4] probably seven months to get that office back into shape.
 [5] It was a total disaster. There was hundreds -- hundreds of
 [6] letters to the President that had never been answered.
 [7] A JUROR: Spread over a long --
 [8] THE WITNESS: Spread over the period of time from,
 [9] you know, when [redacted] started, you know, through Monica. I
 [10] mean, you know, six months, seven months.
 [11] A JUROR: How come this was allowed to happen? Did
 [12] you check [redacted] on her work? Who checked her overall?
 [13] THE WITNESS: It's -- it's hard. It's hard. What
 [14] -- what happened is, they were to task it out and, you know,
 [15] sometimes you have a large volume of letters. Other times,
 [16] you wouldn't have a large volume of letters.
 [17] It's hard to say, you know, what was happening at
 [18] the time. I -- you know, I don't -- I don't quite remember
 [19] why -- I mean, I'm sure I asked about that, why -- you know,
 [20] "Why aren't we sending that much out?"
 [21] But a lot of stuff went to pen and -- you know, a
 [22] lot of stuff that I was getting or receiving or seeing was
 [23] the -- was the bulk letters, you know, where a member of
 [24] Congress would draft a letter and then have, you know, 80
 [25] members co-sign the letter with him. So what you would see

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[1] is a large volume of letters going out, but, in fact, it was
 [2] only answering one.
 [3] BY MR. WISENBERG:
 [4] Q Do you know who complained at OMB?
 [5] A I do not, sir.
 [6] Q Okay. You mentioned that the rumor you heard about
 [7] Monica going to see the President --
 [8] A Yes, sir.
 [9] Q I thought in one version you said you might have
 [10] heard that she also went to see Betty. Was it --
 [11] A I said it could have been Betty or the President.
 [12] She was in that office.
 [13] Q Okay. You don't recall whether the rumor was that
 [14] she saw the President, or Betty?
 [15] A The rumor was that she saw -- one rumor was
 [16] that she saw Betty; the other rumor was that she saw
 [17] the President.
 [18] Q Okay.
 [19] A There was -- you know, she was in and around that
 [20] office on Saturday, after she had been dismissed on Friday.
 [21] MR. WISENBERG: All right. Any other questions?
 [22] (No response.)
 [23] BY MR. WISENBERG:
 [24] Q Let me show you very briefly JJ-4.
 [25] A Yes, sir.

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[1] Q It's a record of an e-mail from Jodie Torkelson on
 [2] April 9, 1996 to Bob Nash and Patsy Thomasson.
 [3] A Okay.
 [4] Q It says: "Both of these staff have secured
 [5] positions in other federal agencies -- Monica at DOD and
 [6] Jocelyn at GSA."
 [7] A "I need to know if either of them --"
 [8] Q "I need to know if either of them is attempting to
 [9] arrange through your offices positions other than the ones
 [10] already arranged at DOD and GSA. Thanks."
 [11] Have you ever seen this before?
 [12] A I've never seen it before.
 [13] Q Okay. Do you know anything about it?
 [14] A No. But it makes sense.
 [15] Q In terms of what Monica was trying to do?
 [16] A Yes, sir.
 [17] Q Okay. Not --
 [18] A I told them. I mean, I -- you know, I -- what I
 [19] was hearing from them -- I was telling them that I was, you
 [20] know, hearing back she was trying to come in as a volunteer
 [21] and intern, which a lot of that would have to go -- all of it
 [22] would have had to go through Jodie.
 [23] Q Are you aware of any memo from Bruce Lindsey -- or
 [24] from anybody -- saying Bruce Lindsey has to be checked with
 [25] before either one of these people come back?

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[1] A No, sir.
 [2] Q Okay. Here's a response, apparently from
 [3] Patsy Thomasson:
 [4] "Bob and I have been working with Tim on placing
 [5] these two people. We're working closely with DOD to make
 [6] this happen for Monica. We have not finalized the deal, but
 [7] are working toward that end.
 [8] "Monica is coming in to see me today pursuant to
 [9] Tim's request of me. Our direction is to make sure she has a
 [10] job in an agency. We're working toward that end. Patsy."
 [11] Is that consistent with your testimony today?
 [12] A Yes, sir.
 [13] Q Are you familiar with this?
 [14] A I've never seen it, but it's --
 [15] Q Okay. Nothing surprising about it?
 [16] A No, sir. It's accurate.
 [17] MR. WISENBERG: Mr. Barger?
 [18] BY MR. BARGER:
 [19] Q I have to two questions.
 [20] A Yes, sir?
 [21] Q Going back to your meeting with Mr. Ickes, what was
 [22] the purpose of your meeting with Ickes in the evening?
 [23] A It was -- we have a -- well, one, it was social,
 [24] but, two, we have a shared client. We're dealing with
 [25] asbestos legislation.

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[1] CERTIFICATE OF REPORTER
 [2] I, Elizabeth J. Walker, the reporter for the
 [3] United States Attorney's Office, do hereby certify that the
 [4] witness(es) whose testimony appears in the foregoing pages
 [5] was first duly sworn by the foreperson or the deputy
 [6] foreperson of the Grand Jury when there was a full quorum of
 [7] the Grand Jury present; that the testimony of said
 [8] witness(es) was taken by me by stenotype and, thereafter,
 [9] reduced to typewritten form; and that the transcript is a
 [10] true record of the testimony given by said witness(es).
 [11]
 [12] Elizabeth J. Walker
 [13] Official Reporter
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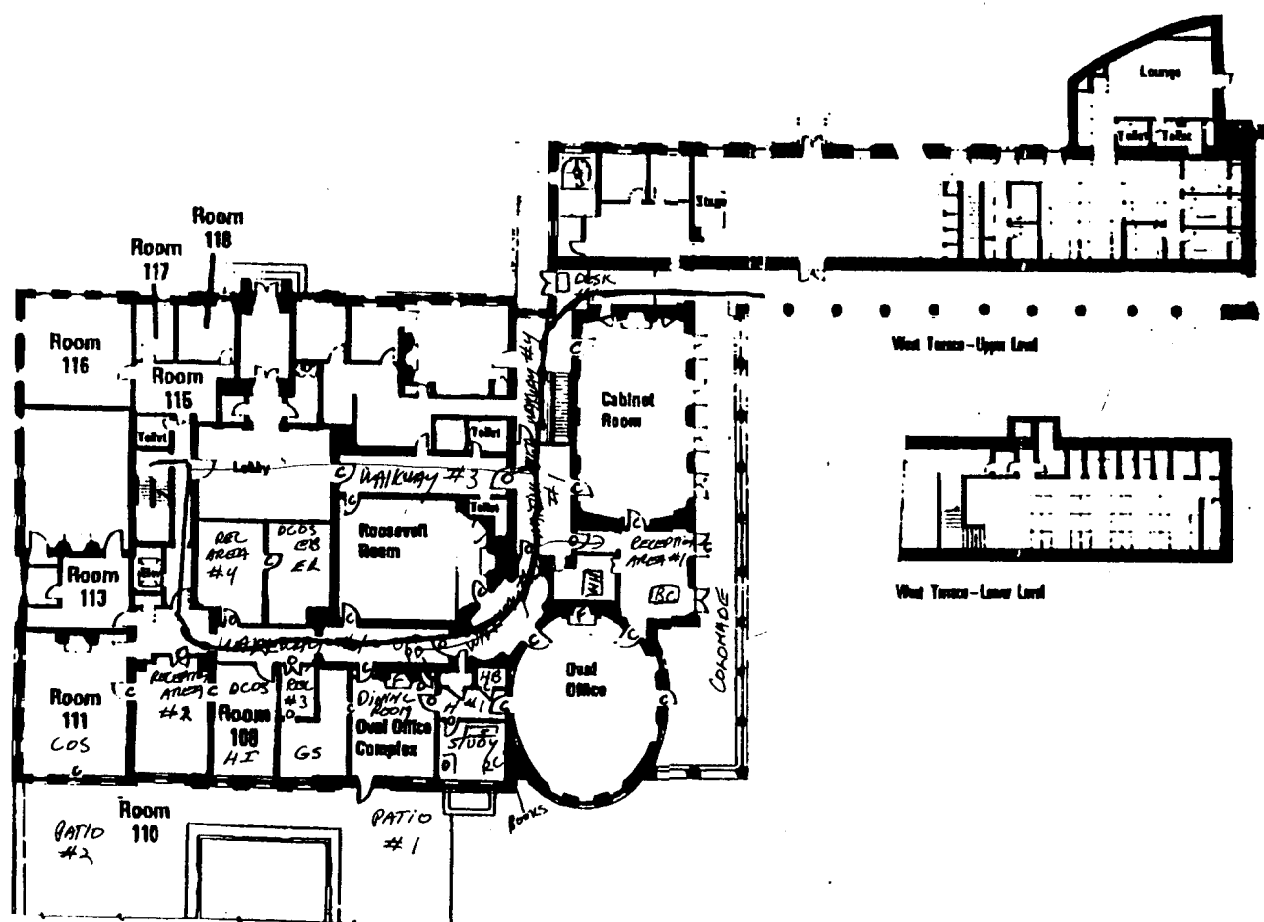
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[1] Q So I take it, then, that the purpose of the meeting
 [2] had nothing to do with your anticipated testimony?
 [3] A No, sir, it didn't. It was set up before that.
 [4] Q Then why was it necessary for Mr. Ickes to remind
 [5] you to tell you the truth?
 [6] A No, sir, it wasn't reminding me to tell the truth.
 [7] He said -- he said to me the next day -- oh, he asked if I
 [8] was nervous about it, and he said, "You know, the only thing
 [9] I can tell you," he said, "I've done a lot of these, is just
 [10] go in there and tell the truth."
 [11] It wasn't a reminder to tell the truth. It was
 [12] just his experiences in the past.
 [13] Q You were testifying also in connection with
 [14] the question asked about have you heard any rumors. And
 [15] you talked about the Saturday meeting with the President
 [16] by Monica.
 [17] My questions goes back to the original question
 [18] which was: Had you heard any rumors about a sexual
 [19] relationship between the President and Monica?
 [20] A At that time, no, sir, I had not.
 [21] MR. BARGER: Okay.
 [22] MR. WISENBERG: All right. Thank you very much for
 [23] your patience. Any other questions?
 [24] (No response.)
 [25] MR. WISENBERG: May the witness be excused?

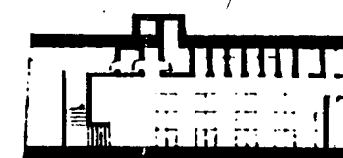
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[1] DEPUTY FOREPERSON: Yes, sir.
 [2] THE WITNESS: Thank you.
 [3] MR. WISENBERG: Thank you very much.
 [4] (The witness was excused.)
 [5] (Whereupon, at 4:51 p.m., the taking of the
 [6] testimony in the presence of a full quorum of the Grand Jury
 [7] was concluded.)
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First Floor



West Terrace - Upper Level



West Terrace - Lower Level

STATEMENT OF TIMOTHY J. KEATING
IN RESPONSE TO PARAGRAPH h. OF THE INSTRUCTIONS
ATTACHED TO THE FEBRUARY 11, 1998 SUBPOENA TO MR. KEATING

Shortly after Ms. Lewinsky was transferred to the Department of Defense from the White House Office of Legislative Affairs, she sent me a three, possibly four, page personal handwritten letter expressing her unhappiness at being transferred. In that letter she also asked to be re-employed or to return as an intern. Soon after receiving that letter, I discarded it. I disposed of this letter because it is not my practice to keep such letters. I showed this document to several others.

